

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
2 Including Professional Corporations  
ORI KATZ, Cal. Bar No. 209561  
3 JEANNIE KIM, Cal. Bar No. 270713  
Four Embarcadero Center, 17<sup>th</sup> Floor  
4 San Francisco, California 94111-4109  
Telephone: 415.434.9100  
5 Facsimile: 415.434.3947  
E mail okatz@sheppardmullin.com  
6 jekim@sheppardmullin.com

7 Attorneys for Debtors and Debtors in Possession

8  
UNITED STATES BANKRUPTCY COURT  
9  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

10 In re

11 THE ROMAN CATHOLIC ARCHBISHOP  
12 OF SAN FRANCISCO,

13 Debtor and  
14 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF ORI KATZ IN  
SUPPORT OF FIRST AND FINAL  
APPLICATION FOR AWARD AND  
ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
INCURRED BY SHEPPARD, MULLIN,  
RICHTER & HAMPTON LLP AS  
DEBTORS' BANKRUPTCY COUNSEL**

*First and Final Application for Award and  
Allowance of Compensation and  
Reimbursement of Expenses Incurred by  
Sheppard, Mullin, Richter & Hampton LLP as  
Debtors' Bankruptcy Counsel Filed  
Concurrently Herewith*

DATE: March 21, 2024  
TIME: 10:00 a.m.  
PLACE: Courtroom 11  
280 S 1st St., 3rd Floor  
San Jose, CA 95113  
or ZoomGov

JUDGE: Hon. M. Elaine Hammond

1 I, Ori Katz, declare as follows:

2 1. I am a partner in the Finance and Bankruptcy Practice Group of the firm Sheppard,  
3 Mullin, Richter & Hampton LLP ("Sheppard Mullin" or the "Applicant"), at its office located at  
4 Four Embarcadero Center, 17<sup>th</sup> Floor, San Francisco, California 94111, and as such am authorized  
5 to make this declaration on behalf of Sheppard Mullin. I am an attorney licensed to practice law in  
6 all of the Courts of the State of California and in all of the United States District Courts in California.  
7 Sheppard Mullin is counsel of record for Formation Group Fund I, L.P. ("FGF"), Formation Group  
8 GP I, LLC ("FGF GP"), and Formation Group (Cayman) Fund I, L.P. ("FGF Cayman," and together  
9 with FGF and FGF GP, collectively, the "Debtors"), each a debtor and debtor in possession in the  
10 above-captioned, jointly administered chapter 11 cases (collectively, the "Bankruptcy Cases").

11 2. The matters stated herein are true and correct and are within my personal knowledge  
12 or information provided to me by other attorneys or employees of Sheppard Mullin, and if called  
13 upon to testify as a witness, I could and would testify competently thereto.

14 3. This declaration is made in support of the *First and Final Application for Award and*  
15 *Allowance of Compensation and Reimbursement of Expenses Incurred by Sheppard, Mullin, Richter*  
16 *& Hampton LLP as Debtors' Bankruptcy Counsel* (the "Application"). I give capitalized terms not  
17 defined here the same meaning given to them in the Application.

18 4. By the Application, Sheppard Mullin seeks an order of the Court: (a) awarding and  
19 allowing final compensation in the amount of **\$1,486,696.78**, consisting of: (i) fees in the amount  
20 of \$1,441,397.00, (ii) expenses in the amount of \$35,299.78, (iii) additional fees of \$10,000 for the  
21 preparation and anticipated Court appearance related to the Application; (b) authorizing Sheppard  
22 Mullin to draw down on the prepetition retainer in the amount of \$53,122.00 (the "Retainer"), which  
23 Retainer Sheppard Mullin currently is holding in its client trust account; (c) authorizing and  
24 directing the Debtors to pay to Sheppard Mullin the balance due on account of fees awarded and  
25 allowed and reimbursement of expenses incurred as allowed and approved by the Court; and (d)  
26 granting such other relief that the Court deems just and proper.

1           5.       Sheppard Mullin's attorneys spent approximately 1,459.6 hours, at a blended hourly  
2 billing rate of \$987.52, performing the services described in the Application during the Application  
3 Period.

4           6.       In view of the time expended, the responsibilities assumed, and the reputation and  
5 skill of the Applicant's attorneys, I submit that the fees requested in the Application represent the  
6 reasonable value of the services rendered on behalf of the Debtors. I believe that the services  
7 rendered were necessary, and that the attorney's fees requested constitute reasonable and necessary  
8 fees. The services Sheppard Mullin performed for the Debtors were provided, in large part, by the  
9 firm's bankruptcy practitioners, as well as the firm's litigators. In some instances, multiple  
10 Sheppard Mullin attorneys reviewed and/or revised the same document or conferred with each other  
11 regarding the same issue because of the complexity and importance of each such document or issue  
12 to the Debtors and these Bankruptcy Cases. I believe the attention devoted to such matters by its  
13 attorneys involved is warranted and appropriate.

14           7.       The Application was prepared at my direction and under my supervision and is the  
15 Applicant's second and final application for compensation in the Bankruptcy Cases. Upon a review  
16 of the Application, I find that it accurately reflects the work performed by the Applicant during the  
17 Application Period and substantively conforms with the with the United States Trustee's guidelines  
18 (the "Trustee's Guidelines") for compensation and expense reimbursement for professionals and the  
19 United States Bankruptcy Court for the Northern District of California's Guidelines for  
20 Compensation and Expense Reimbursement of Professionals and Trustees (the "Northern District  
21 Guidelines," and together with the Trustee's Guidelines, the "Guidelines").

22           8.       Since the FGF/GP Petition Date and as of the date of the Application, Sheppard  
23 Mullin continues to hold the Retainer in its client trust account and has not applied any amounts to  
24 the firm's outstanding receivables associated with these Bankruptcy Cases.

25           9.       There is no agreement or understanding between the Applicant and any other person,  
26 other than members of the Applicant, for the sharing of compensation and expense reimbursement  
27 to be received for services rendered and costs incurred in these Bankruptcy Cases.

1           10. All expense reimbursements requested by the Applicant have been billed at rates in  
2 accordance with practices no less favorable than those customarily employed by the Applicant and  
3 generally accepted by the Applicant's clients.

4           11. Attached to this declaration as Exhibit 1 is a summary of Sheppard Mullin  
5 professionals listing the (a) name and title of each individual who provided services to the Debtor  
6 during the Application Period, (b) aggregate hours spent by each individual, (c) hourly billing rate  
7 for each individual, and (d) amount of fees earned by each individual during the Application Period.

8           12. Attached to this declaration as Exhibit 2 is a summary of the services rendered and  
9 compensation sought, sorted by project category during the Application Period.

10           13. Attached to this declaration as Exhibit 3 is a copy of Sheppard Mullin's invoice for  
11 the Application Period, which include detailed, contemporaneously maintained time entries by each  
12 professional in increments of tenths (1/10) of an hour to describe the fees incurred during the  
13 Application Period as well as descriptions of the expenses advanced on behalf of the Debtors for  
14 which Sheppard Mullin seeks reimbursement.

15           14. Pursuant to the Guidelines, the Applicant provided to the Debtors' Responsible  
16 Individual, Andrew De Camara, a true and correct copy of the Application, along with a letter  
17 inviting discussion, questions, comments, concerns, or objections to the Application. Attached to  
18 this declaration as Exhibit 4 is a copy of that letter.

19           15. The fees and disbursements sought are billed at rates in accordance with those  
20 generally charged by the Applicant and generally accepted by the Applicant's clients.

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1           16.     The Applicant has not charged the Debtors with a premium for the services it has  
2 provided to the Debtor as compared to other services, nor does the Applicant charge a premium for  
3 bankruptcy-related services compared to other services.

4           I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6           Executed on this 29th day of February, 2024, at San Francisco, California.

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*/s/ Ori Katz*  
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Ori Katz

**Exhibit 1**

**Summary of Total Hours and Fees by Professional for Hourly Services for the Period from:  
April 10, 2022 through December 31, 2022**

Attorney	2022			
	Title	Hours	Rate	Amount
Katz, Ori	Partner	103.70	\$ 1,255.00	\$ 130,143.50
Wyatt, William	Partner	0.40	\$ 1,345.00	\$ 538.00
Schendel, Jason	Partner	0.40	\$ 1,095.00	\$ 438.00
Lauter, Michael	Partner	1.10	\$ 995.00	\$ 1,094.50
Cottrell, Amanda	Partner	65.90	\$ 975.00	\$ 64,252.50
Klinger, Matt	Associate	0.90	\$ 915.00	\$ 823.50
Kim, Jeannie	Associate	183.20	\$ 880.00	\$ 161,216.00
Gersten, Steven	Associate	11.50	\$ 880.00	\$ 10,120.00
Segretti, Gianna	Associate	19.10	\$ 770.00	\$ 14,707.00
Erbasi, Koray	Associate	23.50	\$ 655.00	\$ 15,392.50
<b>Total</b>		<b>409.70</b>		<b>\$ 398,725.50</b>

**January 1, 2023 through December 31, 2023**

Attorney	2023			
	Title	Hours	Rate	Amount
Katz, Ori	Partner	87.90	\$ 1,355.00	\$ 119,104.50
Park, Johneth	Partner	1.40	\$ 1,175.00	\$ 1,645.00
Cottrell, Amanda	Partner	169.40	\$ 1,045.00	\$ 177,023.00
Kim, Jeannie	Associate	171.50	\$ 945.00	\$ 162,067.50
Gersten, Steven	Associate	422.90	\$ 945.00	\$ 399,640.50
Erbasi, Koray	Associate	17.00	\$ 700.00	\$ 11,900.00
Natsuhara, Scott	Associate	5.30	\$ 650.00	\$ 3,445.00
Benz, Matt	Associate	34.90	\$ 650.00	\$ 22,685.00
Vigil, Lauryn	Law Clerk	12.40	\$ 210.00	\$ 2,604.00
Weir, Rachel	Law Clerk	9.80	\$ 210.00	\$ 2,058.00
<b>Total</b>		<b>932.50</b>		<b>\$ 902,172.50</b>

**January 1, 2024 through February 23, 2024**

Attorney	2024			
	Title	Hours	Rate	Amount
Katz, Ori	Partner	51.50	\$ 1,465.00	\$ 75,447.50
Kim, Jeannie	Associate	62.10	\$ 1,005.00	\$ 62,410.50
Linares, Eduardo	Associate	3.80	\$ 695.00	\$ 2,641.00
<b>Total</b>		<b>117.40</b>		<b>\$ 140,499.00</b>

**Exhibit 2**

**Summary of Compensation by Project Category for  
Hourly Services for the Period from April 10, 2022 February 23, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
Case Administration	60.4	\$56,770.50
Asset Analysis & Recovery	20.8	\$21,747.50
Asset Disposition	59.5	\$69,012.50
Meetings of and Communications with Creditors	32.9	\$33,644.50
Fee/Employment Applications & Statements	96.0	\$74,739.00
Other Contested Matters (excluding assumption/rejection motions)	1,011.40	\$1,010,644.00
Non-Working Travel	25.0	\$24,295.00
Case Administration – General	15	\$15,974.00
Business Operations	1.6	\$1,546.00
US Trustee Compliance/341 Meeting/Debtor Interview	42.4	\$39,414.00
Financing/Cash Collections	69.6	\$71,917.50
Tax Issues	4.1	\$4,530.50
General Bankruptcy Advice/Opinions	20.9	\$17,162.00
<b>TOTAL:</b>	<b>1,459.6</b>	<b>\$1,441,397.00</b>

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**Exhibit 3**

**Invoice Covering the Application Period  
April 10, 2022 through February 23, 2024**



**Remittance Copy*****Please return this page with your payment.***Brian Koo  
General Partner  
Formation Group Fund  
435 Tasso Street, Suite 315  
Palo Alto, CA 94301SMRH Tax ID 95-1463164  
February 28, 2024  
Invoice 380100495Our Matter No. 73VG-350107  
Formation Group Fund - Restructuring  
Billing Atty: Ori Katz**INVOICE SUMMARY**

FOR PROFESSIONAL SERVICES THROUGH FEBRUARY 23, 2024

Current Fees \$ 1,441,397.00  
Current Disbursements \$ 35,299.78Total Current Activity \$ 1,476,696.78  
Total Due for This Invoice \$ 1,476,696.78**DUE IMMEDIATELY UPON RECEIPT****Inquiries: [armbx@sheppardmullin.com](mailto:armbx@sheppardmullin.com) or contact 213-455-7771****Electronic Payments**

Account Name: Sheppard Mullin Richter & Hampton LLP  
Beneficiary Bank: Account No.: 496-8375493  
Wells Fargo Bank, NA ACH ABA No.: 121000248  
420 Montgomery St Wire ABA No.: 121000248  
San Francisco, CA 94104-1298 Swift Identifier: WFBUIUS6S

**Payment by Check**

Sheppard Mullin Richter & Hampton LLP  
PO Box 840728  
Los Angeles, CA 90084-0728

**Overnight Mail Delivery**

Sheppard Mullin Richter & Hampton LLP  
Wells Fargo Bank Lockbox Services  
Lockbox 840728  
3440 Flair Drive  
El Monte, CA 91731-2823

73VG-350107 Formation Group Fund - Restructuring  
Ori KatzFebruary 28, 2024  
Invoice 380100495  
Page 2 of 2**SUMMARY OF TIMEKEEPER FEES**

<b><u>Tkpr Code</u></b>	<b><u>Timekeeper Name</u></b>	<b><u>Hours</u></b>	<b><u>Avg. Rate/Hr</u></b>	<b><u>Dollars</u></b>
000136	William R. Wyatt	.40	\$ 1,345.00	\$ 538.00
002016	Ori Katz	243.10	\$ 1,335.65	\$ 324,695.50
003213	Johneth C. Park	1.40	\$ 1,175.00	\$ 1,645.00
002718	Jason R. Schendel	.40	\$ 1,095.00	\$ 438.00
002389	Michael Lauter	1.10	\$ 995.00	\$ 1,094.50
003796	Amanda L. Cottrell	235.30	\$ 1,025.40	\$ 241,275.50
003930	Jeannie Kim	416.80	\$ 925.37	\$ 385,694.00
004053	Steven G. Gersten	434.40	\$ 943.28	\$ 409,760.50
003473	Gianna E. Segretti	19.10	\$ 770.00	\$ 14,707.00
003826	Koray Erbas	40.50	\$ 673.89	\$ 27,292.50
004124	Matt Benz	34.90	\$ 650.00	\$ 22,685.00
004110	Scott Natsuhara	5.30	\$ 650.00	\$ 3,445.00
004340	Eduardo G. Linares	3.80	\$ 695.00	\$ 2,641.00
003113	Matt R. Klinger	.90	\$ 915.00	\$ 823.50
004436	Lauryn Vigil	12.40	\$ 210.00	\$ 2,604.00
004479	Rachel Weir	9.80	\$ 210.00	\$ 2,058.00
003930	Jeannie Kim	.70	N/C	\$ 0.00

Brian Koo  
General Partner  
Formation Group Fund  
435 Tasso Street, Suite 315  
Palo Alto, CA 94301

SMRH Tax ID 95-1463164  
February 28, 2024  
Invoice 380100495

Our Matter No. 73VG-350107  
Formation Group Fund - Restructuring  
Billing Atty: Ori Katz

### **INVOICE SUMMARY**

FOR PROFESSIONAL SERVICES THROUGH FEBRUARY 23, 2024

Current Fees	\$ 1,441,397.00
Current Disbursements	\$ 35,299.78

Total Current Activity	<u>\$ 1,476,696.78</u>
Total Due for This Invoice	<u>\$ 1,476,696.78</u>

### **DUE IMMEDIATELY UPON RECEIPT**

**Inquiries: [armbx@sheppardmullin.com](mailto:armbx@sheppardmullin.com) or contact 213-455-7771**

#### **Electronic Payments**

Account Name: Sheppard Mullin Richter & Hampton LLP  
Beneficiary Bank: Wells Fargo Bank, NA  
420 Montgomery St  
San Francisco, CA 94104-1298  
Account No.: 496-8375493  
ACH ABA No.: 121000248  
Wire ABA No.: 121000248  
Swift Identifier: WFBUIUS6S

#### **Payment by Check**

Sheppard Mullin Richter & Hampton LLP  
PO Box 840728  
Los Angeles, CA 90084-0728

#### **Overnight Mail Delivery**

Sheppard Mullin Richter & Hampton LLP  
Wells Fargo Bank Lockbox Services  
Lockbox 840728  
3440 Flair Drive  
El Monte, CA 91731-2823

73VG-350107 Formation Group Fund - Restructuring  
Ori KatzFebruary 28, 2024  
Invoice 380100495  
Page 2 of 170**SUMMARY OF TIMEKEEPER FEES**

<b><u>Tkpr Code</u></b>	<b><u>Timekeeper Name</u></b>	<b><u>Hours</u></b>	<b><u>Avg. Rate/Hr</u></b>	<b><u>Dollars</u></b>
000136	William R. Wyatt	.40	\$ 1,345.00	\$ 538.00
002016	Ori Katz	243.10	\$ 1,335.65	\$ 324,695.50
003213	Johneth C. Park	1.40	\$ 1,175.00	\$ 1,645.00
002718	Jason R. Schendel	.40	\$ 1,095.00	\$ 438.00
002389	Michael Lauter	1.10	\$ 995.00	\$ 1,094.50
003796	Amanda L. Cottrell	235.30	\$ 1,025.40	\$ 241,275.50
003930	Jeannie Kim	416.80	\$ 925.37	\$ 385,694.00
004053	Steven G. Gersten	434.40	\$ 943.28	\$ 409,760.50
003473	Gianna E. Segretti	19.10	\$ 770.00	\$ 14,707.00
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004340	Eduardo G. Linares	3.80	\$ 695.00	\$ 2,641.00
003113	Matt R. Klinger	.90	\$ 915.00	\$ 823.50
004436	Lauryn Vigil	12.40	\$ 210.00	\$ 2,604.00
004479	Rachel Weir	9.80	\$ 210.00	\$ 2,058.00
003930	Jeannie Kim	.70	N/C	\$ 0.00

## FOR PROFESSIONAL SERVICES THROUGH 02/23/24

**FEE DETAIL****Case Administration**

04/11/22	Reviewed correspondence from arbitration tribunal (.2); correspondence to Proskauer regarding chapter 11 case commencement (.2).
	Jeannie Kim .40 hrs. \$ 880.00/hr.
04/11/22	Multiple telephone conferences with A. Rosales (USBC) regarding request for emergency first day hearings (.3); reviewed first day filings (.2); conferred and corresponded with J. Blumberg (UST) regarding comments on motion for joint administration of cases (.3); prepared amended motion for joint administration of cases (.2); drafted omnibus notice of emergency hearing on first day motions (.8); coordinated filing and service of same (.7); drafted creditor mailing matrices (.6); reviewed U.S. Trustee compliance matters (.3).
	Jeannie Kim 3.40 hrs. \$ 880.00/hr.
04/12/22	Corresponded with J. Blumberg regarding comments on proposed order regarding joint administration (.2); reviewed and revised same (.1); telephone conference with J. Blumberg and E. Rofael regarding same (.4); reviewed outstanding case compliance issues (.2); corresponded with U.S. Bankruptcy Court regarding appearances at hearing on first day motions (.1); corresponded with J. Wada regarding compliance matters (.2); corresponded with U.S. Bankruptcy Court regarding proposed order regarding joint administration of cases (.2); corresponded with A. De Camara, L. Jang, and J. Wada regarding U.S. Trustee IDI (.2).
	Jeannie Kim 1.60 hrs. \$ 880.00/hr.
04/14/22	Telephone conference with A. De Camara, L. Jang, and J. Wada regarding initial debtor interview and preparation of responses to questionnaire for same.
	Jeannie Kim .70 hrs. \$ 880.00/hr.
04/17/22	Telephone conference with B. Koo, A. De Camara, L. Jang, S. Asher regarding first day hearing strategy (.4); prepared for first day hearing (.4).
	Jeannie Kim .80 hrs. \$ 880.00/hr.

73VG-350107 Formation Group Fund - Restructuring  
Ori KatzFebruary 28, 2024  
Invoice 380100495  
Page 4 of 170**FEE DETAIL**

04/18/22	Prepare for first day hearing.		
	Ori Katz	1.80 hrs.	\$ 1255.00/hr.
04/18/22	Attend first day hearing.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
04/18/22	Post-hearing discussions with CRO re next steps based on events in court.		
	Ori Katz	1.20 hrs.	\$ 1255.00/hr.
04/18/22	Prepared for first day hearing (.5); appeared at first day hearings (1.2); telephone conference with S. Asher, A. De Camara, L. Jang, and O. Katz regarding hearing results (.4); corresponded with A. De Camara, L. Jang, B. Koo, and S. Asher regarding same (.3); reviewed insurance policies (.2); drafted interim order approving A. De Camara as chief restructuring officer (1.6); reviewed and revised joint administration order (.4); corresponded with Office of the U.S. Trustee regarding initial debtor interview (.3); corresponded with L. Jang and J. Wada regarding IDI responses and preparation of schedules and SOFAs (.3); revised creditor mailing matrix (.1).		
	Jeannie Kim	5.30 hrs.	\$ 880.00/hr.
04/19/22	Attention to post-hearing forms of order		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.

73VG-350107 Formation Group Fund - Restructuring  
Ori KatzFebruary 28, 2024  
Invoice 380100495  
Page 5 of 170**FEE DETAIL**

04/19/22	Reviewed correspondence to B. Koo, L. Jang, and S. Asher regarding first day hearing (.1); corresponded with A. De Camara regarding draft interim chief restructuring officer order (.2); reviewed and revised same (.3); telephone conference with A. De Camara regarding same and IDI issues (.2); reviewed and revised creditor mailing matrix/list of creditors (.1); coordinated filing and service of list of creditors (.2); reviewed and revised joint administrative order (.2); drafted responsible individual order (.1); corresponded with J. Blumberg regarding joint administrative order (.2); corresponded with J. Blumberg, D. Picon, T. Karcher, and T. Keller soliciting comments on interim chief restructuring officer order (.2); coordinated lodging of joint administrative and responsible individual orders (.4); reviewed and revised strategy regarding preparation of IDI responses (.2); revised master pleading caption (.2); lodged first day orders with court (.2); developed strategy to prepare schedules and SOFA/IDI responses (.6); reviewed correspondence from U.S. Bankruptcy Court regarding Zoom hearings (.1).		
	Jeannie Kim	3.50 hrs.	\$ 880.00/hr.
04/20/22	Follow up re preparation of schedules and statement of financial affairs		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.
04/20/22	Attention to proposed order re CRO.		
	Ori Katz	.20 hrs.	\$ 1255.00/hr.
04/20/22	Multiple telephone calls to U.S. Bankruptcy Court regarding filing fee due regarding re-filing of creditor mailing matrix (.3); reviewed top 20 creditors list (.1); reviewed entered order designating A. De Camara as responsible individual (.1); reviewed entered order directing joint administration of cases (.1); corresponded with A. De Camara regarding same (.1); corresponded with A. De Camara and L. Jang regarding U.S. Trustee IDI (.1).		
	Jeannie Kim	.80 hrs.	\$ 880.00/hr.

**FEE DETAIL**

04/21/22 Reviewed and revised Interim Order Appointing A. De Camara as Chief Restructuring Officer (.3); corresponded with J. Blumberg, D. Picon, and T. Karcher regarding same (.2); reviewed U.S. Trustee IDI questionnaire (.2); corresponded with A. De Camara regarding U.S. Trustee IDI responses (.2); corresponded with J. Wada and L. Jang regarding same (.2); corresponded with A. De Camara regarding responsible individual orders in connection with opening of debtor in possession bank accounts (.2).

Jeannie Kim 1.30 hrs. \$ 880.00/hr.

04/22/22 Corresponded with J. Wada regarding initial drafts of schedules and SOFAs (.2); telephone conference with E. Rofael (UST) regarding U.S. Trustee's intention to object to joint administration motion (Cayman) (.3); corresponded with E. Rofael regarding same (.4); corresponded with U.S. Bankruptcy Court regarding same (.2); prepared certificates of service regarding joint administration motion (.2); prepared draft IDI responses (.6); reviewed and revised lists of creditors (.2); coordinated filing and service of same (.4); reviewed correspondence from I. DelRosario regarding Cayman IDI (.1); finalized order granting application to designate A. De Camara as Cayman responsible officer (.1); lodge same with U.S. Bankruptcy Court (.1); finalized order granting ex parte motion for joint administration (.1); lodged same with U.S. Bankruptcy Court (.1); reviewed correspondence with T. Karcher regarding commencement of Cayman chapter 11 case (.2); corresponded with L. Soza regarding retainer balance in connection with preparation of IDI responses (.1); reviewed email service of Cayman petition and related documents (.2); corresponded with A. De Camara and J. Wada regarding strategy for preparation of IDI responses and schedules and SOFA (.1).

Jeannie Kim 3.60 hrs. \$ 880.00/hr.

04/22/22 Prepared Order Approving Designation of A. De Camara as Responsible Individual for filing (Cayman).

Koray Erbası .40 hrs. \$ 655.00/hr.

04/23/22 Corresponded with J. Wada, L. Jang, and A. De Camara regarding preparation of schedules and SOFAs, and responses to U.S. Trustee initial debtor interview questionnaire.

Jeannie Kim .30 hrs. \$ 880.00/hr.



**FEE DETAIL**

04/24/22	Reviewed and revised draft schedules and SOFA (.3); reviewed and revised draft responses to intimal debtor interview questionnaire (1.2); reviewed correspondence from L. Jang regarding documents in support of same (.1); reviewed correspondence from A. De Camara regarding same (.1); corresponded with A. De Camara regarding rescheduling of Cayman IDI (.1).			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">1.80 hrs.</td><td style="text-align: right;">\$ 880.00/hr.</td></tr></table>	Jeannie Kim	1.80 hrs.	\$ 880.00/hr.
Jeannie Kim	1.80 hrs.	\$ 880.00/hr.		
04/25/22	Developed strategy to finalize schedules and SOFAs (.3); conferred and corresponded with J. Wada regarding same (1.1); reviewed and revised draft IDI responses and exhibits (.9); corresponded with I. DelRosario regarding request to advance initial debtor interview for Cayman Fund (.1); corresponded with J. Wada and L. Jang regarding draft IDI responses (.7); corresponded with N. Rivera regarding scheduling of Cayman IDI (.1); reviewed and revised schedules for all debtors prepared by chief restructuring officer (.8); corresponded with J. Wada and L. Jang regarding same (.3); reviewed entered order granting application to designate A. De Camara as responsible officer (.1); corresponded with H. Khanbhai regarding Campbells retainer balance (.2); corresponded with H. Khanbhai regarding pending Cayman litigation (.2); telephone conference with A. De Camara, J. Wada, L. Jang, O. Katz regarding draft schedules and SOFA (.7); corresponded with O. Katz regarding revisions to same (.2); telephone conference with A. De Camara, J. Wada, and L. Jang regarding final drafts of schedules and SOFA (1.3); finalized schedules and SOFA for filing and service (.3); filed schedules and SOFAs (.9); reviewed U.S. Trustee's objection to motion for joint administration of Cayman case with lead case (.1).			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">8.30 hrs.</td><td style="text-align: right;">\$ 880.00/hr.</td></tr></table>	Jeannie Kim	8.30 hrs.	\$ 880.00/hr.
Jeannie Kim	8.30 hrs.	\$ 880.00/hr.		
04/26/22	Attention to the IDI materials.			
	<table border="0"><tr><td style="text-align: right;">Ori Katz</td><td style="text-align: right;">.40 hrs.</td><td style="text-align: right;">\$ 1255.00/hr.</td></tr></table>	Ori Katz	.40 hrs.	\$ 1255.00/hr.
Ori Katz	.40 hrs.	\$ 1255.00/hr.		

**FEE DETAIL**

04/26/22	Reviewed and revised responses to U.S. Trustee IDI questionnaire and supporting exhibits (.8); conferred and corresponded with A. De Camara, J. Wada, and L. Jang regarding same (2.0); corresponded with B. Koo regarding same (.1); corresponded with Office of the U.S. Trustee regarding same (.2); reviewed proposed order granting ex parte motion for joint administration of cases (.2); corresponded with R. Rorabeck (USBC) regarding same (.1); finalized creditor mailing matrix for filing and service of same (.1); reviewed notice of status conference hearing (.1); telephone conference with J. Wada regarding IDI exhibits (.2); corresponded with N. Rivera regarding timing of Cayman Fund IDI and responses to questionnaire (.1); transmitted IDI responses and exhibits to Office of the U.S. Trustee (.4); reviewed correspondence with J. Blumberg regarding terms of final order granting chief restructuring officer motion (.1).
	Jeannie Kim 4.40 hrs. \$ 880.00/hr.
04/27/22	Corresponded with N. Rivera regarding exhibits to IDI questionnaire (.2); reviewed entered order directing joint administration of all three debtors' cases (.1); reviewed correspondence with A. De Camara regarding cash restrictions (.1).
	Jeannie Kim .40 hrs. \$ 880.00/hr.
05/02/22	Participate in IDI via telephone.
	Ori Katz .70 hrs. \$ 1255.00/hr.
05/02/22	Reviewed correspondence with D. Picon regarding proposed final order on motion to appoint A. De Camara as Debtors' chief restructuring officer (.2); developed strategy regarding same and preparation of supplement to motion to appoint A. De Camara as Cayman Fund chief restructuring officer (.1).
	Jeannie Kim .30 hrs. \$ 880.00/hr.
05/03/22	Drafted supplement to Debtors' Emergency chief restructuring officer motion (1.2); reviewed correspondence with T. Karcher regarding comments on final chief restructuring officer order (.4); reviewed and revised draft final chief restructuring officer order (.1); reviewed and revised supplement to chief restructuring officer motion (.2); coordinated filing and service of same (.3).
	Jeannie Kim 2.20 hrs. \$ 880.00/hr.

**FEE DETAIL**

05/03/22	Corresponded with L. Jang and J. Wada regarding preparation of April monthly operating reports (.1); reviewed correspondence from J. Blumberg regarding requested amendments to Debtors' schedules and SOFA (.1).
	Jeannie Kim .20 hrs. \$ 880.00/hr.
05/04/22	Attend hearing on CRO motion.
	Ori Katz .50 hrs. \$ 1255.00/hr.
05/04/22	Drafted notice of hearing on supplement to motion to appoint A. De Camara as Cayman Fund's chief restructuring officer (.2); reviewed and revised same (.2); coordinated filing and service of same (.2); reviewed and revised proposed stipulation regarding adequate protection and use of purported cash collateral (.3); drafted order approving same (.1); corresponded with T. Karcher and D. Picon regarding same (.2); reviewed correspondence with A. De Camara regarding same (.1); reviewed and revised draft final order appointing A. De Camara as chief restructuring officer of FGF and Formation General Partner (.4); corresponded with T. Karcher and J. Blumberg regarding same (.2); corresponded with L. Jang and J. Wada regarding professional fee payments in connection with preparation of April monthly operating reports (.2).
	Jeannie Kim 2.10 hrs. \$ 880.00/hr.
05/04/22	Research issues re service of party in South Korea.
	Matt R. Klinger .90 hrs. \$ 915.00/hr.
05/07/22	Corresponded with T. Karcher regarding authorization to affix electronic signature on final order to appoint A. De Camara chief restructuring officer of FGF and Formation General Partner.
	Jeannie Kim .10 hrs. \$ 880.00/hr.
05/08/22	Reviewed and revised final order appointing A. De Camara chief restructuring officer of FGF and Formation General Partner.
	Jeannie Kim .10 hrs. \$ 880.00/hr.

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05/09/22 Reviewed entered order appointing A. De Camara as chief restructuring officer of FGF and Formation General Partner (.1); corresponded with A. De Camara regarding same (.1); began drafting initial status conference statement (.1).

Jeannie Kim .30 hrs. \$ 880.00/hr.

05/10/22 Corresponded with A. Rosales (USBC) regarding status of filing amended top 20 unsecured creditors list in Cayman Fund case (.1); coordinated filing and service of same (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/13/22 Attend hearing on CRO motion.

Ori Katz .30 hrs. \$ 1255.00/hr.

05/13/22 Reviewed correspondence to A. De Camara and B. Koo regarding results of hearing on motion to appoint A. De Camara as Cayman chief restructuring officer (.1); reviewed correspondence to A. De Camara, B. Koo, and L. Jang regarding results of hearing on supplement to appoint A. De Camara as chief restructuring officer for Cayman Fund (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/13/22 Reviewed correspondence from L. Jang regarding preparation of April monthly operating report (.1); corresponded with L. Jang regarding U.S. Trustee reporting requirements (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/16/22 Telephone conference with E. Stevens regarding draft final order to appoint A. De Camara as Cayman chief restructuring officer, Yesco adequate protection stipulation, and stipulation regarding service of process of adversary proceeding complaint (.1); developed strategy regarding preparation of status conference report (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

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05/16/22	Revised final order appointing A. De Camara as chief restructuring officer for Cayman Fund.		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
05/17/22	Corresponded with A. De Camara regarding comments on draft final order appointing same as chief restructuring officer for Cayman Fund (.1); corresponded with J. Blumberg regarding same (.1); correspondence to T. Karcher and Proskauer team regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
05/19/22	Reviewed and revised draft final order appointing A. De Camara as debtors' chief restructuring officer (.2); corresponded with J. Blumberg, T. Karcher, D. Picon, and E. Stevens regarding proposed final order appointing A. De Camara as debtors' chief restructuring officer (.2); telephone conference with E. Stevens regarding same (.2).		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
05/20/22	Prepared status conference statement (1.2); coordinated filing and service of same (.4).		
	Jeannie Kim	1.60 hrs.	\$ 880.00/hr.
05/25/22	Prepare for status conference.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
05/26/22	Attend status conference in Chapter 11 main case.		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
07/21/22	Corresponded with H. Khanbhai regarding status of Cayman proceedings (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/27/22	Reviewed correspondence from H. Khanbhai regarding next steps in Cayman windup proceeding and developed strategy to respond to same.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.

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08/18/22	Follow up re issues in Cayman proceeding (.4).		
	Ori Katz	.40 hrs.	\$ 1255.00/hr.
08/24/22	Call with Cayman counsel to discuss next steps in that proceeding (.3).		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
09/12/22	Appeared at status conference hearing (.2); correspondence to A. De Camara regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
02/05/23	Prepared status conference report (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/06/23	Continued drafting status conference report (.3); coordinated filing and service of same (.5); corresponded with A. De Camara, L. Jang, and J. Wada regarding same (.1)		
	Jeannie Kim	.90 hrs.	\$ 945.00/hr.
02/08/23	Corresponded with A. De Camara regarding comments on status conference hearing report (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
02/09/23	Prepared for status conference hearing (.3); appeared at same (.2); correspondence to A. De Camara and L. Jang regarding hearing results (.1)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
05/23/23	Began preparation status conference report (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/25/23	Finalized status conference report (.4); coordinated filing and service of same (.2)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.

**FEE DETAIL**

05/26/23	Reviewed correspondence from T. Keller regarding Yesco objection to status conference statement (.1); drafted amendment to status conference statement (.2); corresponded with D. Picon regarding same (.2); coordinated filing and service of same (.2)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
05/31/23	Corresponded with A. Rosales and D. Picon regarding continued status conference hearing (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
08/16/23	Assist with preparation of pro hac vice motion (S. Gersten).		
	Scott Natsuhara	.30 hrs.	\$ 650.00/hr.

*Timekeeper Summary of: Case Administration*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	9.40	\$ 1,255.00	\$ 11,797.00
Matt R. Klinger	0.90	\$ 915.00	\$ 823.50
Koray Erbas	0.40	\$ 655.00	\$ 262.00
Jeannie Kim	49.40	\$ 884.47	\$ 43,693.00
Scott Natsuhara	0.30	\$ 650.00	\$ 195.00
<i>Totals</i>	60.40	\$ 939.91	\$ 56,770.50

**Asset Analysis & Recovery**

06/15/22	Analysis of issues related to ownership of certain stock in portfolio company.		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
06/16/22	Attention to D&O tail.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.

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06/20/22	Attention to D&O tail.		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
08/30/22	Corresponded with A. De Camara regarding D&O insurance (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/13/22	Conferred and corresponded with L. Jang regarding D&O insurance renewal.		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
10/07/22	Corresponded with A. De Camara, J. Wada, and L. Jang regarding deadline renew D&O insurance (.1);		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
10/25/22	Strategy in connection with DIP financing and D&O policy (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
11/04/22	Reviewed correspondence with T. Karcher regarding insurance policy terms (.4); reviewed correspondence with A. De Camara regarding same (.1)		
	Jeannie Kim	.50 hrs.	\$ 880.00/hr.
11/14/22	Corresponded with A. De Camara and L. Jang regarding payment of D&O policy (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/15/22	Corresponded with J. Wada, L. Jang, and A. De Camara regarding status of payment of D&O policy premium (.5)		
	Jeannie Kim	.50 hrs.	\$ 880.00/hr.
12/15/22	Reviewed correspondence from B. Danitz regarding potential estate claims (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/27/22	Attention to stipulation re NextVR proceeds (.8).		
	Ori Katz	.80 hrs.	\$ 1255.00/hr.



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12/27/22	Reviewed correspondence with B. Koo and L. Jang regarding asset analysis.
Jeannie Kim	.10 hrs. \$ 880.00/hr.
12/29/22	Reviewed draft stipulation prepared by Yesco regarding potential distributions from Anavrin dissolution (.2); reviewed correspondence from B. Koo regarding same (.1); conferred with A. De Camara and J. Wada regarding same (.2); reviewed correspondence from L. Jang and J. Wada regarding Anavrin claims (.2)
Jeannie Kim	.70 hrs. \$ 880.00/hr.
12/30/22	Corresponded with A. De Camara regarding Yesco stipulation regarding Anavrin distribution (.2); reviewed correspondence from L. Jang regarding same (.1); conferred with J. Wada regarding same (.1).
Jeannie Kim	.40 hrs. \$ 880.00/hr.
01/05/23	Revised proposed stipulation prepared by Yesco regarding Anavrin distribution (.1); correspondence with A. De Camara, J. Wada, L. Jang, and B. Koo regarding same (.2)
Jeannie Kim	.30 hrs. \$ 945.00/hr.
01/12/23	Reviewed petition to authorize distributions by Anavrin counsel (.1)
Jeannie Kim	.10 hrs. \$ 945.00/hr.
01/27/23	Reviewed and analyzed Anavrin docket and motion for order regarding distributions and dissolution of estate (.4)
Jeannie Kim	.40 hrs. \$ 945.00/hr.
02/01/23	Reviewed petition for dissolution and distributions to stockholders (.2); telephone call to A. Krischler regarding Anavrin distributions (.1)
Jeannie Kim	.30 hrs. \$ 945.00/hr.
02/13/23	Telephone call to A. Krischik regarding Anavrin distribution (.1)
Jeannie Kim	.10 hrs. \$ 945.00/hr.

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02/14/23	Corresponded with A. Krischik regarding Anavrin distribution (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/16/23	Telephone conference with A. Krischik regarding intended treatment of debtors' claim in Anavrin dissolution (.2); correspondence to A. Krischik regarding FGF/Yesco stipulation regarding Anavrin distribution (.2).		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
03/07/23	Corresponded with D. Picon and A. Krischik regarding Anavrin distribution (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
03/20/23	Corresponded with A. De Camara regarding correspondence from Anavrin CEO regarding dissolution of same and anticipated distributions on account of same (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/02/23	Attention to valuation issues related to remaining portfolio companies (.2).		
	Ori Katz	.20 hrs.	\$ 1355.00/hr.
05/02/23	Conferred with O. Katz regarding valuation expert in connection with portfolio companies (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/03/23	Attention to valuation of remaining assets (.6).		
	Ori Katz	.60 hrs.	\$ 1355.00/hr.
05/03/23	Reviewed and analyzed portfolio companies' background (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/09/23	Attention to asset valuation (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.

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05/09/23	Conferred with O. Katz regarding status of Anavrin distribution (.1); reviewed correspondence with B. Koo and A. De Camara regarding portfolio valuation (.2)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/10/23	Reviewed correspondence to B. Koo regarding portfolio valuation (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/13/23	Corresponded with A. De Camara and O. Katz regarding portfolio valuation (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/15/23	Attention to valuation issues re equity interests in portfolio companies (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.
05/15/23	Reviewed correspondence from B. Koo regarding portfolio valuation (.1); reviewed correspondence to D. Picon regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/16/23	Corresponded with A. De Camara and B. Koo regarding valuation expert (.3); coordinated review and execution of engagement agreement for same (.3); reviewed correspondence with D. Picon regarding valuation of portfolio companies (.1).		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
06/01/23	Reviewed correspondence from D. Amour regarding portfolio companies (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/13/23	Corresponded with D. Picon regarding Anavrin distributions (.2); corresponded with A. De Camara and J. Wada regarding same (.3)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.

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06/14/23	Telephone conference with J. Wada regarding Anavrin distribution (.1); corresponded with N. Stuhlmiller and N. Nash regarding status of same (.3)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
06/19/23	Corresponded with B. Koo and L. Jang regarding information request from Marshall Stevens team (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/20/23	Corresponded with N. Nash regarding Anavrin distributions (.1); corresponded with B. Koo, L. Jang, A. De Camara, and J. Wada regarding same (.4); reviewed and analyzed stipulation regarding same (.1)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
06/21/23	Corresponded with A. De Camara regarding Anavrin distribution (.1); correspondence to N. Noah and D. Picon regarding same (.3); reviewed and revised draft notice of distribution (.2)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
06/21/23	Prepared Notice of distribution from Anavrin.		
	Koray Erbas	.90 hrs.	\$ 700.00/hr.
06/22/23	Reviewed and revised notice of distribution from Anavrin (.2); corresponded with D. Picon regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/22/23	Revised notice of distribution.		
	Koray Erbas	.30 hrs.	\$ 700.00/hr.
06/23/23	Corresponded with N. Noah and A. De Camara regarding Anavrin distribution (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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06/26/23      Corresponded with B. Koo and L. Jang regarding response to Marshall Stevens (.1); reviewed correspondence with A. De Camara and L. Jang regarding Anavrin distribution (.1)

Jeannie Kim      .20 hrs.      \$ 945.00/hr.

06/27/23      Corresponded with L. Jang regarding Anavrin distribution (.1); corresponded with N. Nash regarding same (.1)

Jeannie Kim      .20 hrs.      \$ 945.00/hr.

07/07/23      Correspondence with A. De Camara regarding submission of documents to Anavrin claims agent (.1); reviewed correspondence from L. Jang and J. Wada regarding FGF name change in connection with Anavrin distribution requirements (.2); reviewed correspondence from A. De Camara and L. Jang regarding application of same (.2)

Jeannie Kim      .50 hrs.      \$ 945.00/hr.

07/10/23      Corresponded with J. Wada and A. De Camara regarding Anavrin distribution (.1); reviewed correspondence to Anavrin claims agent regarding distribution to FGF (domestic) (.1)

Jeannie Kim      .20 hrs.      \$ 945.00/hr.

07/11/23      Corresponded with A. De Camara regarding Anavrin distribution (.3); reviewed correspondence with B. Koo regarding same (.1)

Jeannie Kim      .40 hrs.      \$ 945.00/hr.

07/14/23      Conferred and corresponded with J. Wada (.3) and A. De Camara (.1) regarding Anavrin distribution; reviewed and revised notice of Anavrin distribution (.1); coordinated filing and service of same (.2); correspondence to D. Picon regarding receipt of Anavrin distribution (.1)

Jeannie Kim      .80 hrs.      \$ 945.00/hr.

07/18/23      Corresponded with D. Armour regarding status of portfolio diligence (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

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08/22/23 Corresponded with D. Armour regarding portfolio companies (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

*Timekeeper Summary of: Asset Analysis & Recovery*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	7.40	\$ 1,292.84	\$ 9,567.00
Koray Erbas	1.20	\$ 700.00	\$ 840.00
Jeannie Kim	12.20	\$ 929.55	\$ 11,340.50
<i>Totals</i>	20.80	\$ 1,045.55	\$ 21,747.50

**Asset Disposition**

03/17/23 Attention to potential sale of stock held in portfolio companies (2.0).

Ori Katz 2.00 hrs. \$ 1355.00/hr.

03/27/23 Work on potential sale motion re interests in remaining portfolio company  
(1.8).

Ori Katz 1.80 hrs. \$ 1355.00/hr.

03/28/23 Prepare outline re sale motion (2.1).

Ori Katz 2.10 hrs. \$ 1355.00/hr.

11/04/23 Drafted fund assets sale motion (.2).

Jeannie Kim .20 hrs. \$ 945.00/hr.

11/06/23 Drafted motion to sell Fund assets (3.5).

Jeannie Kim 3.50 hrs. \$ 945.00/hr.

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11/14/23	Corresponded with L. Jang regarding fund assets (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/29/23	Telephone conference with J. Wada regarding funds assets (.7); corresponded with L. Jang regarding same (.4); reviewed and analyzed schedule of same (.2); reviewed and responded to additional fund asset inquiry from Yesco team (.4).		
	Jeannie Kim	1.70 hrs.	\$ 945.00/hr.
12/05/23	Corresponded with J. Wada regarding EVA dissolution (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
12/06/23	Corresponded with J. Wada regarding disposition of portfolio companies.		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/07/23	Continued drafting sale motion (2.3); correspondence to T. Karcher regarding same (.1); corresponded with J. Wada regarding portfolio company disposition (.1); corresponded with Proskauer team regarding same (.1).		
	Jeannie Kim	2.60 hrs.	\$ 945.00/hr.
12/13/23	Reviewed correspondence with T. Karcher regarding sale of fund assets.		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
12/15/23	Reviewed and revised sale motion (1.4); drafted sale order (.2).		
	Jeannie Kim	1.60 hrs.	\$ 945.00/hr.
12/16/23	Reviewed and revised sale motion (.4); reviewed certificate of cancellation of domestic fund prepared by Yesco (.1).		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
12/17/23	Drafted notice of assets for sale (.8).		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.

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12/18/23	Drafted notice of sale (.3); corresponded with Proskauer team regarding same (.4).		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
12/19/23	Reviewed and revised sale motion.		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
12/19/23	Corresponded with J. Wada regarding draft notice of auction sale (.1); telephone conference with J. Wada regarding sale and settlement status (.6)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
12/20/23	Reviewed and revised sale motion (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/21/23	Reviewed and revised notice of sale (.5); telephone conference with J. Wada regarding same and marketing of fund assets (.4); corresponded with A. De Camara and J. Wada regarding same (.2); corresponded with Proskauer team regarding same (.1).		
	Jeannie Kim	1.20 hrs.	\$ 945.00/hr.
01/17/24	Conferred and corresponded with L. Jang regarding funds dissolution (.4); reviewed schedule of distributions to be made under settlement agreement (.1); corresponded with B. Koo and J. Park regarding funds dissolution (.2).		
	Jeannie Kim	.70 hrs.	\$ 1005.00/hr.
01/24/24	Conferred and corresponded with J. Wada regarding marketing strategy (.2); further developed marketing strategy (.2).		
	Jeannie Kim	.40 hrs.	\$ 1005.00/hr.
01/25/24	Telephone conference with J. Wada regarding notice of sale (.2); reviewed sale notice distribution list (.2).		
	Jeannie Kim	.40 hrs.	\$ 1005.00/hr.



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01/26/24	Telephone conference with D. Ha regarding proposed sale of Memebox interests (.1); corresponded with D. Ha regarding same (.1).
Jeannie Kim	.20 hrs. \$ 1005.00/hr.
01/29/24	Corresponded with S. Park regarding proposed sale of Funds' interests in YelloMobile (.3).
Jeannie Kim	.30 hrs. \$ 1005.00/hr.
01/30/24	Telephone conference with D. Ha regarding proposed sale of Memebox interests (.5); corresponded with D. Ha regarding same (.1); telephone conference with S. Park regarding proposed sale of YelloMobile interests (.4); corresponded with A. De Camara and D. Ha regarding proposed sale of Fund assets (.2); corresponded with A. De Camara regarding same (.1).
Jeannie Kim	1.30 hrs. \$ 1005.00/hr.
01/31/24	Corresponded with T. Karcher regarding marketing of Fund assets (.1); corresponded with A. De Camara regarding sale of Memebox interests (.1).
Jeannie Kim	.20 hrs. \$ 1005.00/hr.
02/01/24	Attention to potential bidders at auction in connection with upcoming section 363 sale (2.7).
Ori Katz	2.70 hrs. \$ 1465.00/hr.
02/05/24	Attention to upcoming section 363 sale based on interest in assets (2.8).
Ori Katz	2.80 hrs. \$ 1465.00/hr.
02/05/24	Corresponded with D. Ha regarding proposed sale of Fund assets [Memebox] (.2); corresponded with B. Koo regarding same [YelloMobile] (.2); reviewed correspondence from L. Jang regarding same (.1); corresponded with A. De Camara regarding sale process (.1)
Jeannie Kim	.60 hrs. \$ 1005.00/hr.
02/09/24	Prepare for potential auction at sale hearing (1.6).
Ori Katz	1.60 hrs. \$ 1465.00/hr.

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02/12/24	Attention to potential section 363 transaction for a subset of debtors' assets (2.6).	Ori Katz	2.60 hrs.	\$ 1465.00/hr.
02/12/24	Corresponded with L. Jang regarding proposed sale of debtors' interests in Memebox (.1); corresponded with A. De Camara regarding proposed sale of estate assets (.4); corresponded with D. Ha and J. Choi regarding sale hearing (.1); corresponded with L. Jang regarding same (.1); reviewed "evidence" of financial wherewithal from potential bidder (.1)	Jeannie Kim	.80 hrs.	\$ 1005.00/hr.
02/13/24	Negotiations with potential purchaser of certain of the debtors' assets re potential private sale (1.0).	Ori Katz	1.00 hrs.	\$ 1465.00/hr.
02/13/24	Correspondence to D. Ha regarding debtors' determination of disqualified bid (.1); telephone conference with D. Ha and J. Choi regarding Memebox bid (.3); telephone call to A. De Camara regarding D. Ha response to sale process (.1); telephone conference with J. Baltzell requesting information to participate in Fund Assets auction (.1); telephone conference with A. De Camara regarding sale process (.4); reviewed correspondence from Y. Jo regarding intent to bid on Fund Assets (.1); conferred and corresponded with J. Baltzell regarding notice of intent to bid on Fund Assets (.1); corresponded with L. Jang regarding Memebox request to bid at auction (.4); corresponded with A. De Camara regarding same (.1); reviewed correspondence from Memebox outside counsel regarding auction process (.1); corresponded with A. De Camara regarding same (.1); telephone call to D. Eastlake regarding same (.1); conferred (.4) and corresponded (.1) with D. Picon and T. Karcher regarding sale process and notices of intent to bid received; developed sale strategy (.4); drafted Memebox nondisclosure agreement (.5)	Jeannie Kim	3.40 hrs.	\$ 1005.00/hr.



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02/20/24	Work on closing checklist items for consummation of settlement, including dismissal and asset sale (2.3).		
	Ori Katz	2.30 hrs.	\$ 1465.00/hr.
02/20/24	Reviewed and revised draft sale order (1.3); multiple emails with GT and Proskauer teams regarding same (.8); corresponded with A. De Camara regarding same (.4), and corresponded with GT team regarding draft Asset Purchase Agreement (.1)		
	Jeannie Kim	2.60 hrs.	\$ 1005.00/hr.
02/21/24	Reviewed further revised form of sale order (.1); corresponded with A. De Camara regarding same and purchase and sale agreement (.2); reviewed convertible note agreement regarding debtors' interest in stock warrants (.2); corresponded with L. Jang regarding same (.1); corresponded with Proskauer team regarding comments on MBX Asset Purchase Agreement and revised sale order (.1); corresponded with GT team regarding same (.2)		
	Jeannie Kim	.90 hrs.	\$ 1005.00/hr.
02/22/24	Continue working to close transaction with Memebox (1.8).		
	Ori Katz	1.80 hrs.	\$ 1465.00/hr.
02/22/24	Reviewed and revised GT draft Asset Purchase Agreement regarding Memebox assets (.4); corresponded with A. De Camara and J. Wada regarding same (.6) corresponded with T. Karcher and D. Eastlake regarding further revised form of sale order (.2); further reviewed and revised Asset Purchase Agreement (.2); telephone conference with K. Lam regarding tax issues in Asset Purchase Agreement (.3); corresponded with A. De Camara regarding same (.2); corresponded with D. Eastlake regarding same (.4); further reviewed and revised Asset Purchase Agreement (.3); further corresponded with A. De Camara regarding same (.2); corresponded with L. Jang and B. Koo regarding Memebox sale (.2)		
	Jeannie Kim	3.00 hrs.	\$ 1005.00/hr.

Jeannie Kim	3.20 hrs.	\$ 1005.00/hr.
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<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	23.40	\$ 1,437.26	\$ 33,632.00
Jeannie Kim	36.10	\$ 980.07	\$ 35,380.50
Totals	59.50	\$ 1,159.87	\$ 69,012.50

Jeannie Kim	.40 hrs.	\$ 880.00/hr.
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04/20/22	Reviewed bituces if 341(a) meeting and other case commencement deficiencies (.2).		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
04/21/22	Discussions with creditors re their claims.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
04/21/22	Telephone conference with P. Sherwood, N. Smith, and O. Katz regarding Cayman limited partners' questions regarding chapter 11 proceedings (.8); correspondence to P. Sherwood regarding commencement of Cayman chapter 11 case (.6).		
	Jeannie Kim	1.40 hrs.	\$ 880.00/hr.
04/25/22	Prepare for IDI and first meeting of creditors by review of documents provided to UST and schedules/SOFA.		
	Ori Katz	2.80 hrs.	\$ 1255.00/hr.
04/26/22	Continued drafting memorandum to C. Olsen regarding US chapter 11 proceedings (.7); corresponded with P. Sherwood and N. Smith regarding schedules and statement of financial affairs for each debtor (.2); reviewed correspondence with D. Cho regarding notice of Chapter 11 filing (.1).		
	Jeannie Kim	1.00 hrs.	\$ 880.00/hr.
04/27/22	Continued drafting memorandum to C. Olsen regarding US chapter 11 proceedings (0.7).		
	Jeannie Kim	.70 hrs.	\$ 880.00/hr.
04/27/22	Corresponded with L. Jang and O. Katz regarding inquiries from limited partners (.2).		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
04/28/22	Continued drafting memorandum to Carey Olsen re US chapter 11 proceedings.		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.

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05/02/22 Reviewed correspondence from J. Blumberg regarding documents required for 341(a) meeting (.1); corresponded with L. Jang and A. De Camara regarding same (.3); prepared responsive documents to send to J. Blumberg regarding same (.1); corresponded with L. Jang, A. De Camara, J. Wada, and O. Katz regarding initial debtor interview (.4); corresponded with N. Rivera regarding documents submitted in advance of same (.2); corresponded with A. De Camara regarding debtor in possession bank accounts (.3).

Jeannie Kim 1.40 hrs. \$ 880.00/hr.

05/02/22 Reviewed correspondence with L. Jang regarding inquiries from limited partners and Debtors' prepetition auditors.

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/03/22 Participate in 341 meetings for domestic fund and its GP.

Ori Katz 2.30 hrs. \$ 1255.00/hr.

05/03/22 Corresponded with J. Wada regarding timing of 341(a) meetings for each debtor.

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/03/22 Corresponded with L. Jang and J. Wada regarding information requests from Yesco in connection with 341(a) meeting (.2).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/04/22 Reviewed correspondence from P. Sherwood regarding commencement of Cayman Fund Chapter 11 case.

Jeannie Kim .10 hrs. \$ 880.00/hr.

05/05/22 Continued drafting memorandum to Carey Olsen re benefits of Chapter 11 proceeding.

Jeannie Kim 1.70 hrs. \$ 880.00/hr.

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05/05/22 Reviewed correspondence from D. Picon regarding Yesco information request after 341(a) meeting (.1); corresponded with A. De Camara and L. Jang regarding same (.3).

Jeannie Kim .40 hrs. \$ 880.00/hr.

05/09/22 Corresponded with A. De Camara and L. Jang regarding draft responses to N. Rivera regarding follow-up requests from initial debtor interview and 341(a) meeting (.2).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/10/22 Telephone conference with L. Jang, A. De Camara, and O. Katz regarding IDI & 341(a) follow up.

Jeannie Kim .70 hrs. \$ 880.00/hr.

05/11/22 Reviewed correspondence to P. Sherwood regarding status of Cayman proceedings (.1); corresponded with H. Khanbai regarding same (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/12/22 Reviewed correspondence with P. Sherwood regarding status of Cayman windup proceedings.

Jeannie Kim .10 hrs. \$ 880.00/hr.

05/16/22 Telephone conference with E. Stevens regarding filing of amended schedules per 341(a) meeting.

Jeannie Kim .10 hrs. \$ 880.00/hr.

05/17/22 Corresponded with J. Wada and L. Jang regarding outstanding deliverables to U.S. Trustee and Yesco following initial 341(a) meeting (.3); corresponded with J. Wada and L. Jang regarding preparation of April monthly operating reports (.2).

Jeannie Kim .50 hrs. \$ 880.00/hr.

05/17/22 Appeared at 341(a) meeting of creditors set for Cayman Fund.

Jeannie Kim .20 hrs. \$ 880.00/hr.



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05/18/22	Corresponded with L. Jang and J. Wada regarding draft amendments to schedules and SOFA (.3); reviewed correspondence from B. Koo regarding inquiries from limited partners (.1).
	Jeannie Kim .40 hrs. \$ 880.00/hr.
05/19/22	Reviewed and analyzed file regarding documents to share with limited partners of Funds (.2); corresponded with J. Wada regarding amendments to schedules and statement of sofa (.2).
	Jeannie Kim .40 hrs. \$ 880.00/hr.
05/20/22	Prepare packet of documents for Mr. Koo to share with LPs.
	Ori Katz .50 hrs. \$ 1255.00/hr.
05/20/22	Reviewed correspondence to B. Koo regarding information to share with limited partners.
	Jeannie Kim .10 hrs. \$ 880.00/hr.
05/21/22	Reviewed correspondence from A. De Camara regarding VR purchase agreement.
	Jeannie Kim .10 hrs. \$ 880.00/hr.
05/22/22	Reviewed draft amendments to schedules and SOFA (.2); corresponded with J. Wada, L. Jang, and A. De Camara regarding same (.4).
	Jeannie Kim .60 hrs. \$ 880.00/hr.
05/23/22	Corresponded with J. Wada regarding outstanding deliverables to U.S. Trustee and Yesco following initial 341(a) meeting.
	Jeannie Kim .20 hrs. \$ 880.00/hr.
05/24/22	Finalized amended schedules and SOFA for filing and service (.3); conferred and corresponded with J. Wada and A. De Camara regarding same (.2).
	Jeannie Kim .50 hrs. \$ 880.00/hr.

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05/25/22	Prepare for continued meeting of creditors.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
05/25/22	Follow up re open 341(a) items with Yesco.		
	Ori Katz	.60 hrs.	\$ 1255.00/hr.
05/26/22	Prepare for continued meeting of creditors.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
05/26/22	Attend continued meeting of creditors.		
	Ori Katz	.70 hrs.	\$ 1255.00/hr.
05/26/22	Conferred and corresponded with A. De Camara, J. Wada, L. Jang, and O. Katz regarding documents to produce to Yesco in advance of 341(a) meeting (.4); telephone conference with J. Wada regarding 341(a) meeting (.4); prepared for same (.2); appear at 341(a) meeting (.9); researched private company reporting requirements (.2); began preparing form protective order for sharing information with Yesco (.2).		
	Jeannie Kim	2.30 hrs.	\$ 880.00/hr.
05/27/22	Conferred and corresponded with J. Wada regarding outstanding deliverables to Yesco and U.S. Trustee following continued 341(a) meeting.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
05/30/22	Corresponded with P. Sherwood and team regarding documents filed with U.S. Bankruptcy Court and orders entered by same in May (.2); reviewed outstanding deliverables following 341(a) meeting (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
05/31/22	Follow up with Yesco re their document requests.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.

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05/31/22	Reviewed correspondence with T. Karcher regarding follow up regarding information requests folloiwng 341(a) meeting.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
06/07/22	Attention to accounting matters relevant to the LPs.		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.
07/21/22	Corresponded with Office of the U.S. Trustee regarding quarterly fees (.1); corresponded with A. De Camara and J. Wada regarding same (.1).		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
08/29/22	Reviewed correspondence from H. Khanbhai regarding draft correspondence to P. Sherwood regarding Cayman proceedings (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/08/22	Revised draft correspondence to P. Sherwood regarding Cayman winding up petition status.		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
09/09/22	Participate in discovery conference (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
09/28/22	Revised draft correspondence to Carey Olsen regarding potential settlement of Cayman winding up petition and case status (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/29/22	Reviewed and revised draft correspondence to Carey Olsen regarding case status and potential settlement discussions (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
10/03/22	Corresponded with H. Khanbhai regarding draft response to Carey Olsen regarding settlement demands (.4); revised "Without Prejudice" letter to Carey Olsen (.5)		
	Jeannie Kim	.90 hrs.	\$ 880.00/hr.

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10/04/22	Corresponded with H. Khanbhai regarding correspondence to Carey Olsen regarding settlement demands (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
10/05/22	Conferred and corresponded with H. Khanbhai regarding responses to Carey Olsen regarding settlement demands (.4)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
05/05/23	Reviewed correspondence with Proskauer regarding status of March monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/11/23	Reviewed and analyzed correspondence from P. Sherwood regarding case status (.1); reviewed correspondence to D. Picon regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/18/23	Reviewed again correspondence from P. Sherwood recase status (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/25/23	Reviewed and responded to correspondence from P. Sherwood regarding case status (.6)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
06/12/23	Reviewed and responded to correspondence from Y. Chng regarding status report (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
09/11/23	Corresponded with P. Yeh (Eight Quarters) regarding status of Cayman case (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
09/13/23	Reviewed correspondence with P. Yeh regarding status of Cayman chapter 11 (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.

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09/19/23	Corresponded with E. Stevens regarding status of July and August monthly operating report (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/06/23	Reviewed correspondence from Y. Chng (Carey Olson) regarding case status (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/10/24	Reviewed correspondence from P. Sherwood regarding proposed dismissal of Cayman petition for windup (.1); corresponded with A. De Camara regarding same (.2).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
01/31/24	Telephone conference with non-debtor affiliate landlord regarding unpaid rent.		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
02/08/24	Reviewed and responded to correspondence from equity interest holder (.1)		
	Jeannie Kim	.10 hrs.	\$ 1005.00/hr.

*Timekeeper Summary of: Meetings of and Communications with Creditors*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	11.90	\$ 1,255.00	\$ 14,934.50
Amanda L. Cottrell	0.40	\$ 975.00	\$ 390.00
Jeannie Kim	20.60	\$ 889.32	\$ 18,320.00
<i>Totals</i>	32.90	\$ 1,022.63	\$ 33,644.50

**Fee/Employment Applications & Statements**

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04/12/22	Telephone conference with K. Erbas regarding preparation of application to employ Sheppard Mullin as general bankruptcy counsel.
	Jeannie Kim .20 hrs. \$ 880.00/hr.
04/13/22	Worked on the draft application to employ Sheppard Mullin.
	Koray Erbas 1.30 hrs. \$ 655.00/hr.
04/25/22	Analyzed potential employment of special Cayman litigation counsel.
	Jeannie Kim .30 hrs. \$ 880.00/hr.
04/25/22	Preliminary review in anticipation of application to employ special Cayman counsel.
	Gianna E. Segretti .40 hrs. \$ 770.00/hr.
04/25/22	Drafted the application to employ Sheppard Mullin and emailed J. Kim re the same.
	Koray Erbas 1.90 hrs. \$ 655.00/hr.
04/28/22	Reviewed Campbells engagement letter (.2).
	Jeannie Kim .20 hrs. \$ 880.00/hr.
04/28/22	Began drafting application to employ Campbells as special litigation counsel.
	Gianna E. Segretti 2.10 hrs. \$ 770.00/hr.
04/29/22	Attention to resolution of issues surrounding appointment of CRO.
	Ori Katz .50 hrs. \$ 1255.00/hr.
05/05/22	Reviewed and revised Sheppard Mullin employment application.
	Jeannie Kim .20 hrs. \$ 880.00/hr.

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05/08/22 Further reviewed and revised application to employ Sheppard Mullin as general insolvency counsel to Debtors.

Jeannie Kim 1.00 hrs. \$ 880.00/hr.

05/09/22 Work on Sheppard employment application.

Ori Katz 1.00 hrs. \$ 1255.00/hr.

05/09/22 Reviewed and revised application to employ Sheppard Mullin (.7); drafted declaration of O. Katz in support of same (.6).

Jeannie Kim 1.30 hrs. \$ 880.00/hr.

05/09/22 Reviewed draft application to employ Campbells as special Cayman counsel.

Jeannie Kim .10 hrs. \$ 880.00/hr.

05/10/22 Finalize Sheppard employment application.

Ori Katz .20 hrs. \$ 1255.00/hr.

05/10/22 Reviewed and revised application to employ Sheppard Mullin as general insolvency counsel (.2); reviewed and revised declaration of O. Katz in support of same (.3); reviewed and analyzed results of conflicts search in support of Sheppard Mullin employment application (.2); corresponded with A. De Camara and L. Jang regarding same (.2).

Jeannie Kim .90 hrs. \$ 880.00/hr.

05/11/22 Finalized and filed/served application to employ Sheppard Mullin as Debtors' counsel (.2); reviewed and revised certificate of service regarding same (.1); reviewed correspondence to B. Koo and L. Jang regarding same (.1).

Jeannie Kim .40 hrs. \$ 880.00/hr.

05/12/22 Reviewed correspondence with J. Blumberg regarding comments on Debtors' application to employ Sheppard Mullin (.2); retrieved list of equity interest holders of each Debtor in response to same (.1).

Jeannie Kim .30 hrs. \$ 880.00/hr.

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05/13/22	Coordinated conflicts check regarding equity interest holders in response to U.S. Trustee inquiry regarding same in connection with Sheppard Mullin employment application (.2); reviewed Campbell's prepetition invoices (.1); continued review and revisions of application to employ same as special Cayman counsel (.2).		
	Jeannie Kim	.50 hrs.	\$ 880.00/hr.
05/13/22	Continued working on application to employ special litigation counsel.		
	Gianna E. Segretti	.30 hrs.	\$ 770.00/hr.
05/18/22	Reviewed conflicts report regarding equity interest holders.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
05/18/22	Reviewed and analyzed Sheppard Mullin conflict report.		
	Koray Erbası	.60 hrs.	\$ 655.00/hr.
05/19/22	Reviewed and analyzed equity interest holder conflicts report (.3); corresponded with K. Erbası regarding same (.2); reviewed and revised supplemental declaration of O. Katz in support of Sheppard Mullin employment application (.4).		
	Jeannie Kim	.90 hrs.	\$ 880.00/hr.
05/19/22	Prepared Katz supplemental declaration in support of SMRH employment application.		
	Koray Erbası	1.30 hrs.	\$ 655.00/hr.
05/23/22	Review and finalize supplement to Sheppard employment.		
	Ori Katz	.20 hrs.	\$ 1255.00/hr.
05/23/22	Revised supplemental declaration of O. Katz in support of Sheppard Mullin employment application (.4); telephone conference with J. Blumberg regarding comments on same (.2); revised proposed order employing Sheppard Mullin and supplemental Katz declaration in response to same (.2); coordinated filing and service of same (.2).		
	Jeannie Kim	1.00 hrs.	\$ 880.00/hr.



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05/23/22	Continued drafting application to employ special litigation counsel.		
	Gianna E. Segretti	1.60 hrs.	\$ 770.00/hr.
05/26/22	Continued drafting application to employ special litigation counsel.		
	Gianna E. Segretti	1.50 hrs.	\$ 770.00/hr.
05/27/22	Continued drafting application to employ special litigation counsel.		
	Gianna E. Segretti	.50 hrs.	\$ 770.00/hr.
05/30/22	Developed strategy regarding preparation of application to employ Campbells as special Cayman counsel.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
05/30/22	Finished drafting application to employ special litigation counsel (4.0); drafted declaration in support of application to employ special litigation counsel (0.5).		
	Gianna E. Segretti	4.50 hrs.	\$ 770.00/hr.
06/08/22	Worked on the application to employ Kranz & Associates as accountants.		
	Koray Erbası	.60 hrs.	\$ 655.00/hr.
06/09/22	Assisted K. Erbası in preparing application to employ accountant.		
	Gianna E. Segretti	.30 hrs.	\$ 770.00/hr.
06/09/22	Worked on the draft application to employ Kranz & Associates for accounting services of the debtor.		
	Koray Erbası	4.10 hrs.	\$ 655.00/hr.
06/10/22	Reviewed draft of application to employ accountant.		
	Gianna E. Segretti	.10 hrs.	\$ 770.00/hr.
07/19/22	Developed strategy to prepare application to employ Kranz as accountant.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.

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11/12/22 Corresponded with J. Blumberg (UST) regarding Province employment application (.2) and Sheppard Mullin employment application (.1); drafted Province supplemental declaration in support of employment (1.4); drafted proposed order granting Province employment application (.5); corresponded with P. Huygens regarding same (.1); revised proposed order granting Sheppard Mullin employment application (.2); drafted supplemental declaration of O. Katz in support of Sheppard Mullin employment (.1).

Jeannie Kim 2.60 hrs. \$ 880.00/hr.

03/15/23 Conferred and corresponded with S. Gersten regarding estate employment of discovery vendor (.2); conferred with A. Cottrell and O. Katz regarding same (.1)

Jeannie Kim .30 hrs. \$ 945.00/hr.

03/15/23 Confer with M. White and Consilio team re engagement for document collection and hosting services to support discovery in adversary proceeding against Yesco.

Steven G. Gersten .60 hrs. \$ 945.00/hr.

03/16/23 Reviewed correspondence with discovery vendor regarding retention terms (.1); reviewed correspondence with L. Jang regarding retention of discovery vendor (.2)

Jeannie Kim .30 hrs. \$ 945.00/hr.

03/16/23 Read and analyze draft Consilio Management services agreement and Statement of Work.

Steven G. Gersten .80 hrs. \$ 945.00/hr.

03/17/23 Corresponded with L. Jang regarding e-discovery (.1); reviewed and analyzed draft engagement letter regarding same (.3)

Jeannie Kim .40 hrs. \$ 945.00/hr.

03/21/23 Reviewed draft Consilio (e discovery vendor) engagement letter (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

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03/21/23	Further reviewed draft e-discovery vendor engagement agreement (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
03/22/23	Reviewed revised engagement letter (.2) and corresponded with M. Smith regarding same (.2)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
03/27/23	Reviewed and reviewed draft agreement to engage discovery vendor (.2); corresponded with M. Smith (Consilio) regarding same (.2); began preparation of application to employ Consilio as discovery vendor (.4)		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
03/27/23	Finalize revisions to Consilio statement of work;		
	Steven G. Gersten	.30 hrs.	\$ 945.00/hr.
03/27/23	Draft application to employ Consilio as a vendor to provide eDiscovery document production services.		
	Koray Erbas	.90 hrs.	\$ 700.00/hr.
03/28/23	Reviewed and revised e-discovery vendor engagement letter (.1); continued preparation of application to employ same (.2); corresponded with B. Koo and A. De Camara regarding review and execution of same (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
03/28/23	Finalize Consilio engagement letter; confer with O. Katz re executing same.		
	Steven G. Gersten	.40 hrs.	\$ 945.00/hr.
03/29/23	Follow up re preparation of application to employ e-discovery vendor (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
03/31/23	Reviewed correspondence with M. Smith regarding e-discovery vendor retention status (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.

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04/03/23	Correspondence to O. Katz re: Consilio engagement.		
	Amanda L. Cottrell	.10 hrs.	\$ 1045.00/hr.
04/06/23	Revised draft engagement letter for chief restructuring officer review and execution (.2); corresponded with A. De Camara (.1) and S. Gersten (.2) regarding same		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
04/06/23	Continued drafting the application to employ Consilio as e-discovery vendor.		
	Koray Erbası	.60 hrs.	\$ 700.00/hr.
04/07/23	Corresponded with S. Gersten regarding executed Consilio engagement agreement (.1); corresponded with A. De Camara regarding same (.1); conferred with K. Erbası regarding terms of Consilio engagement and preparation of application to employ same (.2)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
04/10/23	Corresponded with A. De Camara regarding review and execution of Consilio engagement agreement (.2); corresponded with S. Gersten regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
04/11/23	Continued drafting application to employ Consilio.		
	Koray Erbası	2.50 hrs.	\$ 700.00/hr.
04/12/23	Email re Aines Law's question re SMRH Second Monthly Fee Statement.		
	Koray Erbası	.20 hrs.	\$ 700.00/hr.
04/12/23	Revised application to employ Consilio (0.5). Prepared proposed order granting application to employ Consilio (0.5).		
	Koray Erbası	1.00 hrs.	\$ 700.00/hr.
04/13/23	Reviewed and revised application to employ Consilio (1.3).		
	Jeannie Kim	1.30 hrs.	\$ 945.00/hr.

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04/14/23	Corresponded with L. Jang regarding Consilio retainer (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/14/23	Continued revising application to employ Consilio as litigation support consultant.		
	Koray Erbası	2.50 hrs.	\$ 700.00/hr.
04/17/23	Further reviewed and revised application to employ litigation support consultant (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/17/23	Prepared Flanagan declaration in support of application to employ Consilio.		
	Koray Erbası	2.10 hrs.	\$ 700.00/hr.
04/18/23	Revised Flanagan declaration in support of application to employ Consilio.		
	Koray Erbası	.40 hrs.	\$ 700.00/hr.
04/25/23	Further revised Consilio employment application (.4).		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
04/27/23	Reviewed draft declaration in support of Consilio employment application (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/27/23	Revised Flanagan declaration in support of Consilio employment application.		
	Koray Erbası	1.00 hrs.	\$ 700.00/hr.
04/28/23	Corresponded with M. Smith regarding comments on draft declaration in support of Consilio employment (.4); revised declaration in support of Consilio employment application (.6); further revised Consilio employment application (.1)		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.

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05/01/23	Corresponded with M. Smith regarding Consilio conflicts (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/02/23	Conferred and corresponded with M. Smith and D. Grant regarding application to employ Consilio as litigation support consultant (.6)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
05/05/23	Corresponded with M. Smith regarding declaration in support of Consilio employment application (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/09/23	Follow-up correspondence to M. Smith regarding declaration in support of Consilio employment application (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/11/23	Conferred and corresponded with D. Grant regarding Consilio employment application (.8); reviewed and revised declaration of M. Flanagan in support of same (.1); reviewed and revised Consilio employment application (.1); coordinated filing and service of same (.2)		
	Jeannie Kim	1.20 hrs.	\$ 945.00/hr.
05/12/23	Corresponded with D. Grant regarding outstanding conflicts search and status of review and execution of Flanagan declaration in support of Consilio employment application (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/13/23	Corresponded with A. De Camara regarding Consilio employment (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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05/15/23	Corresponded with M. Smith regarding Consilio invoices (.2); corresponded with D. Grant regarding status of declaration in support of Consilio employment application (.2); corresponded with Z. Pope regarding Consilio invoices (.1); conferred and corresponded with S. Gersten regarding Consilio employment (.2); telephone conference with Z. Pope and S. Gersten regarding same and compensation to Consilio (subject to court approval) (.3); corresponded with A. De Camara regarding same (.1).			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">1.10 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.
Jeannie Kim	1.10 hrs.	\$ 945.00/hr.		
05/15/23	Confer with J. Kim and M. White (Consilio) re preparation of Consilio's fee application and fees incurred.			
	<table border="0"><tr><td style="text-align: right;">Steven G. Gersten</td><td style="text-align: right;">.50 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Steven G. Gersten	.50 hrs.	\$ 945.00/hr.
Steven G. Gersten	.50 hrs.	\$ 945.00/hr.		
05/16/23	Corresponded with A. De Camara regarding Consilio fees and services (.1)			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">.10 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
Jeannie Kim	.10 hrs.	\$ 945.00/hr.		
05/18/23	Corresponded with D. Grant regarding further comments on draft application to employ Consilio and supporting declaration of M. Flanagan (.3); further revised supporting declaration of M. Flanagan per D. Grant's comments (.3).			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">.60 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
Jeannie Kim	.60 hrs.	\$ 945.00/hr.		
05/19/23	Corresponded with D. Grant regarding further comments on application to employ Consilio and supporting declaration of M. Flanagan (.4); coordinated filing and service of same (.4).			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">.80 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
Jeannie Kim	.80 hrs.	\$ 945.00/hr.		
05/22/23	Attention to issues re employment of non-legal professionals (.4).			
	<table border="0"><tr><td style="text-align: right;">Ori Katz</td><td style="text-align: right;">.40 hrs.</td><td style="text-align: right;">\$ 1355.00/hr.</td></tr></table>	Ori Katz	.40 hrs.	\$ 1355.00/hr.
Ori Katz	.40 hrs.	\$ 1355.00/hr.		
05/22/23	Prepared proposed order granting Consilio employment (.2); reviewed and revised same per comments received from Yesco (.2); correspondence to T. Karcher and D. Picon regarding same (.1)			
	<table border="0"><tr><td style="text-align: right;">Jeannie Kim</td><td style="text-align: right;">.50 hrs.</td><td style="text-align: right;">\$ 945.00/hr.</td></tr></table>	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
Jeannie Kim	.50 hrs.	\$ 945.00/hr.		

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05/23/23      Corresponded with D. Picon regarding comments on proposed form of order employing Consilio (.2); drafted notice of revised form of proposed order (.6); coordinated filing and service of same (.4)

Jeannie Kim      1.20 hrs.      \$ 945.00/hr.

05/23/23      Revised proposed order granting Consilio employment application.

Koray Erbası      .20 hrs.      \$ 700.00/hr.

05/24/23      Conferred and corresponded with J. Blumberg regarding application to employ Consilio (.3); corresponded with B. Koo and L. Jang regarding Consilio retainer (.3); reviewed interim estimate regarding Consilio fees/expenses (.1); conferred and corresponded with J. Wada regarding same (.4)

Jeannie Kim      1.10 hrs.      \$ 945.00/hr.

05/25/23      Reviewed and revised proposed form of order granting Consilio employment per U.S. Trustee comments (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

05/30/23      Corresponded with J. Wada regarding Consilio retainer (.1); corresponded with L. Jang and B. Koo re same (.1); further reviewed and revised proposed order authorizing Consilio employment (.2); revised draft notice of same (.1); corresponded with J. Blumberg regarding same (.1); corresponded with A. De Camara, B. Koo and L. Jang regarding same (.1); reviewed correspondence from D. Picon regarding employment of expert to value portfolio companies (.1); corresponded with B. Koo and A. De Camara regarding same (.1) and next steps (.1); corresponded with A. De Camara regarding review and execution of valuation engagement agreement (.1); corresponded with D. Armour regarding executed engagement letter for valuation services (.1); began preparation of employment application (.2); corresponded with L. Jang regarding funding of retainer (.1).

Jeannie Kim      1.50 hrs.      \$ 945.00/hr.

05/31/23      Corresponded with L. Jang regarding funding of Marshall Stevens and Consilio retainers (.1); corresponded with B. Koo regarding same (.1); corresponded with A. De Camara regarding Marshall Stevens invoice (.1)

Jeannie Kim      .30 hrs.      \$ 945.00/hr.



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06/02/23	Corresponded with E. Stevens regarding status of Consilio employment (.2); reviewed and revised notice of revised proposed order (.1); corresponded with K. Erbas regarding status of application to employ Marshall Stevens (.2); corresponded with Z. Pope regarding Consilio work in process (.1)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
06/02/23	Drafted application to employ Marshall & Stevens.		
	Koray Erbas	3.30 hrs.	\$ 700.00/hr.
06/02/23	Prepared proposed order granting application to employ Marshall & Stevens.		
	Koray Erbas	.70 hrs.	\$ 700.00/hr.
06/05/23	Reviewed and revised proposed order granting Consilio employ application (.1); reviewed and revised notice of revised proposed order regarding same (.1); coordinated filing and service of same (.2); corresponded with J. Wada regarding treatment of Marshall Stevens retainer (.2); corresponded with L. Jang regarding status of same (.2)		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
06/06/23	Final review of notice of revised proposed order granting Consilio employ application (.2); lodged proposed order (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/13/23	Reviewed correspondence from Z. Pope regarding Consilio fees (.1); corresponded with L. Jang regarding post-petition employment of tax professionals (.2)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/14/23	Corresponded with L. Jang and J. Wada regarding employment of accounting professionals (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/15/23	Corresponded with L. Jang and J. Wada regarding employment of tax and audit accountants and special litigation counsel (.2); began preparation of same (.2)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.

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06/16/23	Reviewed sections 327, 328, and 1107 and 1108 of bankruptcy code, FRBP 2014, local court rules. Assisted in preparing applications to employ special litigation counsel, audit accountant, tax accountant and general accountant.		
	Rachel Weir	2.40 hrs.	\$ 210.00/hr.
06/19/23	Prepared applications to employ special litigation counsel, tax and audit accountants (.4)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
06/26/23	Conferred with R. Weir regarding facts in support of audit and tax accountant employment applications (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/26/23	Worked on employment applications for Kranz and Associates and Campbells. Reviewed adversary proceeding motion to dismiss.		
	Rachel Weir	3.20 hrs.	\$ 210.00/hr.
06/27/23	Drafted application to employ Frank, Rimerman Co., and Andersen		
	Rachel Weir	1.70 hrs.	\$ 210.00/hr.
06/28/23	Reviewed and responded correspondence from Consilio regarding invoice and remaining retainer balance (.2); reviewed correspondence from T. Keller regarding service of Consilio employment application on Daeryuk (creditor) (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/29/23	Drafted Kranz Employment Application		
	Rachel Weir	.30 hrs.	\$ 210.00/hr.
07/07/23	Reviewed Employment Applications for Kranz, Rimerman and Campbells. Drafted Employment Application for Andersen.		
	Rachel Weir	2.20 hrs.	\$ 210.00/hr.

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07/24/23	Corresponded with Z. Pope regarding Consilio retainer balance (.1); correspondence with A. De Camara regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
07/25/23	Corresponded with A. De Camara regarding Consilio fees (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/15/23	Prepared pro hac vice application of S. Gerten.		
	Scott Natsuhara	2.90 hrs.	\$ 650.00/hr.
09/22/23	Reviewed Consilio invoice (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/31/23	Corresponded with J. Wada regarding Consilio invoices (.2); developed strategy regarding e-discovery consultant services (.3)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
12/30/23	Reviewed notice of delinquent Consilio account receivable (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/26/24	Reviewed and responded to correspondence from A. De Camara regarding delinquent Consilio invoice.		
	Jeannie Kim	.10 hrs.	\$ 1005.00/hr.
01/30/24	Began preparation of Sherwood final fee application.		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
01/30/24	Reviewed and revised documents in support of final fee application.		
	Jeannie Kim	.70 hrs.	\$ 1005.00/hr.
01/31/24	Prepared documents in support of Sheppard Mullin final fee application.		
	Jeannie Kim	.80 hrs.	\$ 1005.00/hr.

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02/01/24	Continued preparation of documents in support of final fee application (.3)		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
02/02/24	Continued preparation of documents in support of Sheppard Mullin final fee application (.7)		
	Jeannie Kim	.70 hrs.	\$ 1005.00/hr.
02/04/24	Continued preparation documents in support of Sheppard Mullin final fee application (1.2)		
	Jeannie Kim	1.20 hrs.	\$ 1005.00/hr.
02/05/24	Drafted Sherwood/De Camara final fee application (1.7); drafted declaration of A. De Camara in support of same (.3); corresponded with J. Wada regarding final fee application (.2); prepared documents in support of Sheppard Mullin final fee application (.2)		
	Jeannie Kim	2.40 hrs.	\$ 1005.00/hr.
02/06/24	Continued preparation documents in support of Sheppard Mullin final fee application (1.6)		
	Jeannie Kim	1.60 hrs.	\$ 1005.00/hr.
02/07/24	Reviewed and revised documents in support of final fee application (.2)		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
02/12/24	Follow-up regarding documents in support of Sheppard Mullin final fee application (.2); reviewed and revised same (.6)		
	Jeannie Kim	.80 hrs.	\$ 1005.00/hr.
02/22/24	Further reviewed and revised documents in support of Sheppard Mullin final fee application (.5)		
	Jeannie Kim	.50 hrs.	\$ 1005.00/hr.

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*Timekeeper Summary of: Fee/Employment Applications & Statements*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	2.30	\$ 1,272.39	\$ 2,926.50
Gianna E. Segretti	11.30	\$ 770.00	\$ 8,701.00
Amanda L. Cottrell	0.10	\$ 1,045.00	\$ 104.50
Koray Erbas	25.20	\$ 682.50	\$ 17,199.00
Jeannie Kim	41.80	\$ 942.78	\$ 39,408.00
Steven G. Gersten	2.60	\$ 945.00	\$ 2,457.00
Scott Natsuhara	2.90	\$ 650.00	\$ 1,885.00
Rachel Weir	9.80	\$ 210.00	\$ 2,058.00
<i>Totals</i>	96.00	\$ 778.53	\$ 74,739.00

**Other Contested Matters (excluding assumption/rejection motions)**

04/10/22	Review petitions and declaration.		
	Amanda L. Cottrell	.50 hrs.	\$ 975.00/hr.
04/11/22	Correspondence with Tribunal re: chapter 11 petitions (.1); correspondence with Proskauer re: same with focus on preliminary hearing cancellation (.1); follow up correspondence with O. Katz and J. Kim (.2).		
	Amanda L. Cottrell	.40 hrs.	\$ 975.00/hr.
04/12/22	Began preparation of adversary proceeding cover sheet in connection with preparation of complaint against Yesco to subordinate claims (.1); telephone conference with S. Asher, L. Jang, and O. Katz regarding strategy to assert claims against Yesco (.5); corresponded with S. Asher and O. Katz regarding same (.1).		
	Jeannie Kim	.70 hrs.	\$ 880.00/hr.
04/13/22	Review and analyze further revised adversary complaint from J. Kim (.5); conference call and emails with J. Kim re: same (.4).		
	Amanda L. Cottrell	.90 hrs.	\$ 975.00/hr.

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04/13/22	Reviewed and revised adversary proceeding cover sheet in connection with preparation of complaint against Yesco (.4); developed strategy regarding subordination of Yesco claims (.7); revised Yesco complaint (1.5); corresponded with B. Koo regarding comments on same (.2); researched service issues (.1); telephone conference with B. Danitz, A. De Camara, A. Cottrell regarding Yesco complaint (.3).		
	Jeannie Kim	3.20 hrs.	\$ 880.00/hr.
04/14/22	Correspondence with J. Kim re: draft adversary complaint (.1); review Yesco's objection to first day motions (.2).		
	Amanda L. Cottrell	.30 hrs.	\$ 975.00/hr.
04/15/22	Developed strategy regarding Yesco complaint.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
04/18/22	Reviewed and revised Yesco complaint.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
04/19/22	Revisions to Yesco complaint.		
	Ori Katz	1.80 hrs.	\$ 1255.00/hr.
04/19/22	Reviewed and revised Yesco complaint.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
04/20/22	Developed strategy regarding revisions to Yesco complaint.		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
04/21/22	Further changes to Yesco adversary proceeding.		
	Ori Katz	.80 hrs.	\$ 1255.00/hr.

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04/21/22 Reviewed and revised adversary proceeding complaint against Yesco (2.1); prepared insert to complaint regarding option agreements and expiration dates of same (.3); reviewed correspondence to B. Koo, L. Jang, S. Asher, and A. De Camara requesting comments on revised draft complaint (.1).

Jeannie Kim 2.50 hrs. \$ 880.00/hr.

04/22/22 Reviewed and revised draft complaint against Yesco.

Jeannie Kim .60 hrs. \$ 880.00/hr.

04/23/22 Reviewed comment on draft Yesco complaint from A. De Camara.

Jeannie Kim .10 hrs. \$ 880.00/hr.

04/26/22 Revise and finalize the Yesco adversary complaint.

Ori Katz 1.50 hrs. \$ 1255.00/hr.

04/26/22 Reviewed and revised Yesco complaint (.2); reviewed correspondence with B. Koo and A. De Camara regarding same (.1); reviewed correspondence with B. Koo regarding press inquiries from S. Korea (.2).

Jeannie Kim .50 hrs. \$ 880.00/hr.

04/28/22 Finalize complaint against Yesco re fraudulent transfer and related causes of action flowing from option transactions.

Ori Katz 2.00 hrs. \$ 1255.00/hr.

04/28/22 Reviewed and revised Yesco complaint and finalized same for filing and service (.4); reviewed and revised adversary proceeding cover sheet (.2); coordinated filing and service of complaint against Yesco (.2); correspondence to B. Koo, A. De Camara, L. Jang, and S. Asher regarding conformed copy of complaint (.1); correspondence to D. Picon and T. Karcher regarding same (.1); corresponded with P. Sherwood and N. Smith regarding same (.2).

Jeannie Kim 1.20 hrs. \$ 880.00/hr.

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04/29/22 Reviewed summons and notice of status conference issued by U.S. Bankruptcy Court (.1); reviewed correspondence with D. Picon and T. Karcher regarding service of process regarding same (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/02/22 Corresponded with A. Cottrell regarding status of complaint against Yesco.

Jeannie Kim .10 hrs. \$ 880.00/hr.

05/03/22 Developed strategy regarding service of process of summons and complaint (.2); reviewed correspondence with D. Picon regarding same (.1).

Jeannie Kim .30 hrs. \$ 880.00/hr.

05/04/22 Reviewed and analyzed research regarding service of process of summons and complaint against Yesco under Hague Convention.

Jeannie Kim .20 hrs. \$ 880.00/hr.

05/05/22 Prepare for meet and confer with Yesco on various open items in main case and adversary proceeding.

Ori Katz 1.00 hrs. \$ 1255.00/hr.

05/05/22 Developed strategy regarding service of process of summons and complaint (.2); reviewed correspondence with T. Karcher regarding same (.1);

Jeannie Kim .30 hrs. \$ 880.00/hr.

05/10/22 Attention to strategy for Yesco adversary proceeding in connection with potential summary judgment motion.

Ori Katz 2.00 hrs. \$ 1255.00/hr.

05/10/22 Developed strategy regarding prosecution of adversary proceeding to subordinate Yesco's claims against Debtors.

Jeannie Kim .10 hrs. \$ 880.00/hr.



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05/11/22	Analysis of issues in Cayman proceeding and potential intersection with bankruptcy cases in US.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
05/11/22	Conferred and corresponded with T. Karcher regarding service of process of summons and complaint to subordinate Yesco claims (.2); developed strategy regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
05/13/22	Developed strategy regarding prosecution of adversary proceeding (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
05/26/22	Prepared stipulation regarding service of process of summons and complaint and discovery deadlines.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
06/10/22	Meeting and confer with Yesco re documents to be provided.		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
06/10/22	Attention to Yesco document production.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
06/13/22	Drafted stipulation to govern deadlines and milestones in adversary proceeding (2.2); drafted Yesco protective order (1.7).		
	Jeannie Kim	3.90 hrs.	\$ 880.00/hr.
06/16/22	Attention to doc production.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
06/20/22	Document collection in anticipation of next phase of Yesco litigation.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.

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06/23/22	Work on outline for summary judgment motion in Yesco adversary proceeding.
	Ori Katz 2.60 hrs. \$ 1255.00/hr.
06/24/22	Finalize outline for summary judgment against Yesco.
	Ori Katz 1.00 hrs. \$ 1255.00/hr.
06/27/22	Follow up re Yesco adversary proceeding anticipated issues.
	Ori Katz .60 hrs. \$ 1255.00/hr.
06/28/22	Attention to analysis re EVA stock in connection with Yesco action.
	Ori Katz 1.00 hrs. \$ 1255.00/hr.
07/08/22	Attention to discovery requests of Yesco (.4).
	Ori Katz .40 hrs. \$ 1255.00/hr.
07/08/22	Attention to discovery to be propounded on Yesco in aid of anticipated summary judgment motion (1.2).
	Ori Katz 1.20 hrs. \$ 1255.00/hr.
07/15/22	Telephone conference with T. Karcher regarding open items.
	Jeannie Kim .20 hrs. \$ 880.00/hr.
07/20/22	Revised proposed protective order (.2); revised stipulation and order regarding service of process (.1); drafted notice of lodging protective order (.1); revised proposed orders on same (.2); coordinated filing and service of same (.2); corresponded with E. Stevens and T. Karcher regarding same (.1).
	Jeannie Kim .90 hrs. \$ 880.00/hr.
07/20/22	Prepared noticing of filing of proposed stipulated protective order for filing. (0.4) Prepared stipulated protective order for submission. (0.3)
	Gianna E. Segretti .70 hrs. \$ 770.00/hr.

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07/20/22	Prepared notice of filing of proposed stipulated protective order, and proposed order to approve stipulation between debtors and Yesco Holdings.		
	Koray Erbası	1.50 hrs.	\$ 655.00/hr.
07/21/22	Reviewed entered order approving stipulation regarding service of process and protective order (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/22/22	Corresponded with T. Karcher regarding conformed copies of stipulations regarding service of process and protective order.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/25/22	Developed strategy regarding complaint to subordinate claims (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/26/22	Reviewed notice of appearance filed by D. Brar (Keller Benvenuti & Kim) in Yesco adversary proceeding (.1); reviewed entry of order approving stipulation regarding service of process and extended answer deadline (.1); transmitted same to A. De Camara/J. Wada (Sherwood) and L. Jang/B. Koo (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
07/27/22	Reviewed entered order approving stipulation regarding service of process and extended answer/response deadline.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/28/22	Corresponded with B. Koo, A. De Camara, L. Jang, and S. Asher regarding Yesco motion to dismiss complaint to subordinate claims (.3); developed strategy regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
07/29/22	Review and analyze Yesco's Motion to Dismiss and cited authorities.		
	Amanda L. Cottrell	1.50 hrs.	\$ 975.00/hr.

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07/30/22	Research authorities and case law cited in Yesco's Motion to Dismiss.		
	Amanda L. Cottrell	1.50 hrs.	\$ 975.00/hr.
08/01/22	Review and analysis of the Yesco motion to dismiss in connection with outline in response to same (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
08/01/22	Call with Ms. Cottrell and Ms. Kim re adversary strategy (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
08/01/22	Conference call with O. Katz re: Yesco's motion to dismiss, strategy and budget.		
	Amanda L. Cottrell	.80 hrs.	\$ 975.00/hr.
08/01/22	Developed strategy to defend against Yesco's motion to dismiss (.8)		
	Jeannie Kim	.80 hrs.	\$ 880.00/hr.
08/03/22	Evaluation of settlement strategy involving stay of cases (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
08/15/22	Attention to upcoming opposition brief on motion to dismiss (.8).		
	Ori Katz	.80 hrs.	\$ 1255.00/hr.
08/26/22	Outline and begin to research issues for analysis and research in opposition to Yesco's motion to dismiss.		
	Amanda L. Cottrell	1.00 hrs.	\$ 975.00/hr.
08/26/22	Developed strategy regarding motion to dismiss adversary proceeding.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/05/22	Research, draft and revise opposition to Yesco's motion to dismiss.		
	Amanda L. Cottrell	2.50 hrs.	\$ 975.00/hr.

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09/06/22	Work on adversary proceeding strategy re dismissal motion and discovery (2.4).		
	Ori Katz	2.40 hrs.	\$ 1255.00/hr.
09/06/22	Research, draft and revise response in opposition to Yesco's motion to dismiss with focus on fact issues.		
	Amanda L. Cottrell	2.30 hrs.	\$ 975.00/hr.
09/06/22	Developed strategy to defend against motion to dismiss adversary proceeding (.6); reviewed correspondence to A. Rosales (U.S. Bankruptcy Court) regarding rescheduling of Sept. 27 hearing (.1); reviewed correspondence to Yesco counsel regarding same (.1); reviewed docket regarding order continuing status conference hearing (.1).		
	Jeannie Kim	.90 hrs.	\$ 880.00/hr.
09/07/22	Attention to opposition to Yesco's motion to dismiss (2.3).		
	Ori Katz	2.30 hrs.	\$ 1255.00/hr.
09/07/22	Research, draft and revise response in opposition to Yesco's motion to dismiss; conference with O. Katz re: same.		
	Amanda L. Cottrell	2.70 hrs.	\$ 975.00/hr.
09/08/22	Draft briefing in opposition to Yesco motion to dismiss.		
	Amanda L. Cottrell	3.70 hrs.	\$ 975.00/hr.
09/08/22	Reviewed and analyzed Yesco motion to dismiss (.1); reviewed schedules in connection with development of opposition strategy (.2).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/09/22	Conference with Tobias Keller (.5) for the court-ordered Discovery Conference; draft and revise response in opposition to Motion to Dismiss (3).		
	Amanda L. Cottrell	3.50 hrs.	\$ 975.00/hr.

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09/09/22	Meet and confer with T. Keller (counsel for Yesco) and A. Cottrell re scheduling and discovery conference.		
	Steven G. Gersten	.40 hrs.	\$ 880.00/hr.
09/10/22	Review response in opposition to motion to dismiss.		
	Amanda L. Cottrell	1.00 hrs.	\$ 975.00/hr.
09/11/22	Additional research and briefing in opposition to motion to dismiss.		
	Amanda L. Cottrell	2.00 hrs.	\$ 975.00/hr.
09/12/22	Review and revise response to motion to dismiss.		
	Amanda L. Cottrell	4.70 hrs.	\$ 975.00/hr.
09/12/22	Corresponded with T. Keller regarding hearing on motion to dismiss.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/13/22	Attention to revisions to draft brief in opposition to motion to dismiss (2.3).		
	Ori Katz	2.30 hrs.	\$ 1255.00/hr.
09/13/22	Revise response to Yesco motion to dismiss.		
	Amanda L. Cottrell	1.90 hrs.	\$ 975.00/hr.
09/13/22	Reviewed correspondence with T. Keller regarding discovery conference. (0.10); prepared pro hac application of A. Cottrell (.4)		
	Jeannie Kim	.50 hrs.	\$ 880.00/hr.
09/13/22	Read and analyze Yesco's motion to dismiss and accompanying declarations and documentary evidence (.8); researched case law to oppose same (1.2).		
	Steven G. Gersten	2.00 hrs.	\$ 880.00/hr.
09/14/22	Email memorializing discovery conference to opposing counsel (.3); correspondence re: scheduling conference resetting (.1).		
	Amanda L. Cottrell	.40 hrs.	\$ 975.00/hr.

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09/15/22	Revisions to opposition to motion to dismiss (1.5).		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.
09/15/22	Strategized with Ms. Kim regarding response to motion to dismiss.		
	Michael Lauter	.60 hrs.	\$ 995.00/hr.
09/15/22	Draft and revise response to motion to dismiss (2); draft Mr. Jang declaration (1); draft Rule 56(d) affidavit (1); conferences with O. Katz and team re: finalization of brief (.6).		
	Amanda L. Cottrell	4.60 hrs.	\$ 975.00/hr.
09/15/22	Revised opposition to Yesco motion to dismiss (1.5); revised declaration of L. Jang in support of same (.2); conferred and corresponded with L. Jang regarding same (.2); developed strategy regarding revisions to opposition to motion to dismiss (1.1).		
	Jeannie Kim	3.00 hrs.	\$ 880.00/hr.
09/15/22	Revise O. Katz declaration in support of response to motion to dismiss (.7); draft R. Jang declaration in support of same (1.4); revise response to motion to dismiss (3.8); confer with O. Katz, A. Cottrell, and J. Kim re finalizing response and declarations in support (.5).		
	Steven G. Gersten	6.40 hrs.	\$ 880.00/hr.
09/16/22	Finalize papers in opposition to motion to dismiss (2.0).		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
09/16/22	Revise and finalize response brief and supporting declarations.		
	Amanda L. Cottrell	2.60 hrs.	\$ 975.00/hr.

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09/16/22	Telephone conference with B. Danitz regarding declaration of L. Jang in support of opposition to Yesco motion to dismiss (.3); conferred and corresponded with L. Jang, A. De Camara, O. Katz, and A. Cottrell regarding same (1.7); reviewed and revised same (.8); reviewed and revised declaration of O. Katz regarding discovery conference (.7); reviewed and revised opposition to Yesco motion to dismiss (1.4); revised pro hac application of A. Cottrell (.4); coordinated filing and service of opposition to motion to dismiss (.2)		
	Jeannie Kim	5.50 hrs.	\$ 880.00/hr.
09/16/22	Finalized opposition to Yesco's motion to dismiss and supporting declarations (2.1).		
	Koray Erbası	2.10 hrs.	\$ 655.00/hr.
09/16/22	Prepared pro hac vice application for A. Cottrell and proposed order (1.1).		
	Koray Erbası	1.10 hrs.	\$ 655.00/hr.
09/19/22	Prepared pro hac vice application for A. Cottrell (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
09/20/22	Revised proposed order granting pro hac application of A. Cottrell (.1); coordinated filing and service of pro hac application and lodging of order regarding same (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/21/22	Conference with O. Katz re: discovery control plan (.1); analyze anticipated discovery needs and draft plan to confer with opposing counsel (.4).		
	Amanda L. Cottrell	.50 hrs.	\$ 975.00/hr.
09/21/22	Rvised security agreement (.3); telephone conference with O. Katz, A. Cottrell, and S. Gersten regarding discovery strategy (.3).		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
10/03/22	Preparation for in person oral argument on Yesco's motion to dismiss.		
	Amanda L. Cottrell	.40 hrs.	\$ 975.00/hr.



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10/03/22	Prepared for hearing on Yesco motion to dismiss (.2); reviewed court orders regarding initial scheduling conference (.2)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
10/04/22	Reviewed reply to Formation opposition to Yesco motion to dismiss (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
10/05/22	Reviewed Yesco reply in support of motion to dismiss and prepared for hearing on same (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
10/06/22	Analysis of the Yesco reply brief re motion to dismiss (.8).		
	Ori Katz	.80 hrs.	\$ 1255.00/hr.
10/06/22	Developed strategy regarding oral argument in response to Yesco reply in support of motion to dismiss (.3); reviewed and analyzed schedules in connection with AHB/EVA ownership (.4); corresponded with J. Wada regarding same (.1); corresponded with T. Keller regarding joint statement regarding discovery plan (.3); drafted same (.4).		
	Jeannie Kim	1.50 hrs.	\$ 880.00/hr.
10/06/22	Confer with O. Katz and A. Cottrell re motion to dismiss (.5).		
	Steven G. Gersten	.50 hrs.	\$ 880.00/hr.
10/07/22	Corresponded with A. Cottrell regarding Yesco's comments on joint statement regarding discovery plan (.1); corresponded with T. Keller regarding same (.2); revised same (.2); coordinated filing and service of same (.3); corresponded with J. Wada and L. Jang regarding EVA/AHB affiliate status (.3)		
	Jeannie Kim	1.10 hrs.	\$ 880.00/hr.
10/10/22	Review and comment on hearing outline for motion to dismiss (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.

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10/10/22	Draft and revise outline of oral argument re Yesco motion to dismiss (2.5); review and analyze Yesco's cited authority (1.5); conference with O. Katz re: same (.5).		
	Amanda L. Cottrell	4.50 hrs.	\$ 975.00/hr.
10/11/22	Prepare for and attend hearing on motion to dismiss (3.0).		
	Ori Katz	3.00 hrs.	\$ 1255.00/hr.
10/11/22	Continue to revise and finalize oral argument by Yesco's motion to dismiss (2.2); appear and argue in opposition to Yesco's motion to dismiss (2.4).		
	Amanda L. Cottrell	4.60 hrs.	\$ 975.00/hr.
10/31/22	Corresponded with H. Khanbhai regarding disposition of Yesco motion to dismiss (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/14/22	Evaluation of game plan for potential resolution of Yesco matters (2.0).		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
11/16/22	Attention to litigation next steps in light of ruling on motion to dismiss (2.0).		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
11/16/22	Confer with T. Keller re: parties conferral on discovery per Court's summary judgment order.		
	Amanda L. Cottrell	.10 hrs.	\$ 975.00/hr.
11/17/22	Reviewed correspondence with Yesco counsel regarding Rule 26 discovery conference (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
11/30/22	Reviewed correspondence with D. Picon regarding Rule 26 meet and confer meeting (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.

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12/01/22	Prepare for meeting with Yesco to discuss adversary proceeding (.3).		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
12/01/22	Meet and confer with Yesco re adversary proceeding (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
12/01/22	Meet and confer with Yesco's counsel on pretrial discovery issues.		
	Amanda L. Cottrell	.60 hrs.	\$ 975.00/hr.
12/02/22	Confer with restructuring team re: pleading amendment, trial date and pretrial schedule.		
	Amanda L. Cottrell	.40 hrs.	\$ 975.00/hr.
12/02/22	Confer with O. Katz, J. Kim, and A. Cottrell re proposed discovery and trial schedule and amendment to adversary complaint.		
	Steven G. Gersten	.50 hrs.	\$ 880.00/hr.
12/05/22	Draft and revise proposed pretrial schedule (.6).		
	Amanda L. Cottrell	.60 hrs.	\$ 975.00/hr.
12/05/22	Corresponded with A. Rosales regarding potential trial dates (.3); developed strategy regarding filing joint status report (.4); reviewed draft briefing schedule (.1); reviewed and revised draft joint status report (.2); corresponded with Sheppard Mullin litigation team regarding same (.1)		
	Jeannie Kim	1.10 hrs.	\$ 880.00/hr.
12/05/22	Drafted status conference statement.		
	Gianna E. Segretti	1.00 hrs.	\$ 770.00/hr.
12/06/22	Draft and revise proposed joint report and discovery control plan (1); meet and confer with Yesco's counsel per Rule 26 (.5); correspondence to D. Picon re: pretrial timetable (.2); review and edit draft stipulation on pretrial conference (.2).		
	Amanda L. Cottrell	1.90 hrs.	\$ 975.00/hr.

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12/06/22	Revised joint status report (.1); prepared draft long form adversary proceeding scheduling order (.8); drafted first amended complaint (.2)		
	Jeannie Kim	1.10 hrs.	\$ 880.00/hr.
12/06/22	Meet and confer with S. Picone and T. Keller re discovery and pretrial schedule.		
	Steven G. Gersten	.40 hrs.	\$ 880.00/hr.
12/07/22	Reply to T. Keller and edit draft email to Court re: pretrial conference and trial setting.		
	Amanda L. Cottrell	.10 hrs.	\$ 975.00/hr.
12/09/22	Correspondence with Tobias Keller re: continuance of status conference and pretrial schedule.		
	Amanda L. Cottrell	.20 hrs.	\$ 975.00/hr.
12/09/22	Drafted first amended complaint (2.6)		
	Jeannie Kim	2.60 hrs.	\$ 880.00/hr.
12/12/22	Review and edit amended adversary complaint.		
	Amanda L. Cottrell	1.20 hrs.	\$ 975.00/hr.
12/12/22	Reviewed initial internal comments on draft first amended complaint (.1); reviewed court calendar regarding Dec. 12 scheduling conference (.1); correspondence with T. Keller (.2) and A. Rosales regarding September trial dates (.2); reviewed correspondence to D. Picon regarding pretrial timetable (.2)		
	Jeannie Kim	.80 hrs.	\$ 880.00/hr.
12/13/22	Attention to revised complaint (.8).		
	Ori Katz	.80 hrs.	\$ 1255.00/hr.

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12/13/22	Reviewed org chart and conferred with Ms. Kim and Mr. Katz re operation of 510(b) relative to each debtor.		
	Michael Lauter	.50 hrs.	\$ 995.00/hr.
12/13/22	Corresponded with L. Jang regarding first amended complaint strategy (.2); reviewed and revised draft first amended complaint (.6); developed strategy regarding subordination claim (.3)		
	Jeannie Kim	1.10 hrs.	\$ 880.00/hr.
12/13/22	Reviewed correspondence with Yesco's counsel regarding proposed scheduling order (.1); reviewed and analyzed defendant's proposed trial schedule (.1).		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
12/13/22	Review and analyze proposed order setting forth proposed discovery and trial schedule.		
	Steven G. Gersten	.30 hrs.	\$ 880.00/hr.
12/14/22	Attention to discovery matters in adversary proceeding (2.0).		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
12/14/22	Conferred and corresponded with L. Jang regarding first amended complaint against Yesco (.3); revised same (.3)		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
12/15/22	Call with Mr. Danitz re arbitration matter (.2).		
	Ori Katz	.20 hrs.	\$ 1255.00/hr.
12/15/22	Draft and revise scheduling order.		
	Amanda L. Cottrell	.50 hrs.	\$ 975.00/hr.
12/15/22	Revised first amended complaint (.2); developed strategy regarding trial schedule (.2)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.

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12/16/22	Revised first amended complaint (.9)		
	Jeannie Kim	.90 hrs.	\$ 880.00/hr.
12/19/22	Developed strategy regarding first amended complaint (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/21/22	Finalized first amended complaint and prepared redline of same to original complaint (.3); reviewed correspondence to D. Picon requesting defendant's consent to plaintiff's filing of first amended complaint (.1)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
12/22/22	Explore potential Yesco settlement (1.7).		
	Ori Katz	1.70 hrs.	\$ 1255.00/hr.
12/22/22	Reviewed correspondence to E. Stephens and D. Picon regarding defendant's objections to draft pretrial scheduling order (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/22/22	Begin drafting initial disclosures for discovery in adversary proceeding against Yesco.		
	Steven G. Gersten	.60 hrs.	\$ 880.00/hr.
12/23/22	Reviewed correspondence from E. Stevens regarding defendant's objections to draft pretrial scheduling order (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/27/22	Reviewed correspondence to D. Picon regarding draft first amended complaint (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/28/22	Attention to Yesco litigation discovery issues (.6).		
	Ori Katz	.60 hrs.	\$ 1255.00/hr.

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12/28/22	Draft initial disclosures per FRCP 26.		
	Amanda L. Cottrell	1.50 hrs.	\$ 975.00/hr.
12/28/22	Reviewed draft initial disclosures (.2); corresponded with litigation team regarding strategy regarding first amended complaint (.2); reviewed correspondence with D. Picon regarding consent to filing of first amended complaint (.1)		
	Jeannie Kim	.50 hrs.	\$ 880.00/hr.
12/28/22	Reviewed correspondence with E. Stevens regarding defendant's objections to draft pretrial scheduling order.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/29/22	Developed discovery and claim litigation strategy (.1); Reviewed correspondence with E. Stevens regarding pretrial scheduling order (.1)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
12/30/22	Attention to initial disclosures in Yesco litigation (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
12/30/22	Attention to first amended complaint (.9).		
	Ori Katz	.90 hrs.	\$ 1255.00/hr.
12/30/22	Conference with O. Katz and S. Gertsen re: subordination strategy and disclosures (.3); analyze attorney notes from O. Katz re: same (.1); finalize and serve Rule 26 initial disclosures (.3).		
	Amanda L. Cottrell	.60 hrs.	\$ 975.00/hr.
12/30/22	Reviewed initial disclosures (.2); correspondence to A. De Camara, L. Jang, and B. Koo regarding initial disclosures served on Yesco (.1); developed discovery strategy (.4); reviewed correspondence from D. Picon regarding pretrial scheduling order (.1)		
	Jeannie Kim	.80 hrs.	\$ 880.00/hr.

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12/30/22	Develop strategy to subordinate Yesco's claim.		
	Steven G. Gersten	.40 hrs.	\$ 880.00/hr.
01/03/23	Reviewed correspondence with D. Picon regarding draft pretrial scheduling order (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/05/23	Conference with D. Picon re: scheduling matters and pleading amendment (.3); revise scheduling order (.2).		
	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
01/05/23	Reviewed correspondence with D. Picon regarding further negotiation of pretrial scheduling conference terms (.2); finalized first amended complaint for filing and service (.3); corresponded with A. De Camara, B. Koo, J. Wada, and L. Jang regarding same (.1)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
01/09/23	Attention to filing joint agreed scheduling order (.1); draft and revise first set of document requests, interrogatories, and requests for admission to Yesco (3).		
	Amanda L. Cottrell	3.10 hrs.	\$ 1045.00/hr.
01/09/23	Corresponded with E. Stevens and D. Picon regarding submission of pretrial scheduling order (.2); finalized same for submission (.3); coordinated lodging of same (.3); corresponded with U.S. Bankruptcy Court regarding same (.2)		
	Jeannie Kim	1.00 hrs.	\$ 945.00/hr.
01/09/23	Revise and finalize draft requests for production and interrogatories to Yesco.		
	Steven G. Gersten	1.70 hrs.	\$ 945.00/hr.
01/10/23	Appeared at scheduling conference hearing (.3); corresponded with A. Cottrell regarding draft pretrial scheduling order (.2)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.



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01/11/23	Corresponded with D. Picon regarding establishing deadline for Yesco to respond to complaint (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/12/23	Attention to upcoming litigation deadlines in Yesco adversary proceeding (.8).		
	Ori Katz	.80 hrs.	\$ 1355.00/hr.
01/12/23	Review and analyze Yesco's discovery to identify common objections and strategy for responses; conference with O. Katz re: same.		
	Amanda L. Cottrell	1.20 hrs.	\$ 1045.00/hr.
01/12/23	Conferred with O. Katz, A. Cottrell, and S. Gersten regarding litigation strategy (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
01/12/23	Confer with A. Cottrell and O. Katz re Yesco's requests for production, interrogatories, and requests for admission.		
	Steven G. Gersten	.60 hrs.	\$ 945.00/hr.
01/16/23	Corresponded with T. Keller regarding stipulation regarding extension of time to answer first amended complaint (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/17/23	Correspondence with T. Keller and A. Cottrell regarding stipulation to establish Yesco deadline to answer complaint (.1); reviewed conformed copy of same and transmit to A. De Camara and B. Koo (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
01/19/23	Reviewed adversary proceeding scheduling order (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
01/27/23	Begin to draft objections to Yesco's RFAs and ROGs (2); correspondence to D. Picon re: extension of time (.1); correspondence with O. Katz re: same (.1).		
	Amanda L. Cottrell	2.20 hrs.	\$ 1045.00/hr.

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01/27/23	Reviewed correspondence to Yesco counsel regarding discovery deadlines (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/30/23	Correspondence with D. Picon to confirm two-week extension on Formation's responses to written discovery.		
	Amanda L. Cottrell	.10 hrs.	\$ 1045.00/hr.
01/30/23	Continue to draft and revise objections to Yesco's ROGs, RFAs, and RFPs.		
	Amanda L. Cottrell	1.60 hrs.	\$ 1045.00/hr.
01/30/23	Correspondence with D. Picon and A. Cottrell regarding agreed revision of discovery deadlines (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/02/23	Reviewed correspondence regarding reciprocal extensions of discovery deadlines (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/06/23	Draft and revise objections to RFAs and RFPs.		
	Amanda L. Cottrell	1.40 hrs.	\$ 1045.00/hr.
02/07/23	Correspondence with O. Katz, B. Koo and L. Jang re: discovery issues and scheduling.		
	Amanda L. Cottrell	.40 hrs.	\$ 1045.00/hr.
02/07/23	Correspondence with B. Koo and L. Jang regarding strategy to respond to discovery (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
02/08/23	Draft global objections to Yesco's discovery definitions (.8); draft objections and responses to each document request (1).		
	Amanda L. Cottrell	1.80 hrs.	\$ 1045.00/hr.

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02/08/23	Corresponded with L. Jang regarding discovery responses (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
02/13/23	Attention to discovery in Yesco litigation matter (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.
02/14/23	Corresponded with L. Jang regarding discovery (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
02/17/23	Correspondence with O. Katz and B. Koo re: finalization of discovery responses.		
	Amanda L. Cottrell	.40 hrs.	\$ 1045.00/hr.
02/17/23	Corresponded with B. Koo and L. Jang regarding discovery responses (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/18/23	Revise discovery responses; conference with clients re: same.		
	Amanda L. Cottrell	2.20 hrs.	\$ 1045.00/hr.
02/18/23	Telephone conference with B. Koo, L. Jang, O. Katz, and A. Cottrell regarding strategy to respond to Yesco discovery (1.0); reviewed and analyzed follow-up correspondence to same regarding proposed responses (.1).		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.
02/21/23	Corresponded with A. De Camara, B. Koo, L. Jang, and J. Wada regarding Yesco answer to first amended complaint (.1); corresponded with L. Jang and B. Koo regarding discovery responses (.2).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
02/21/23	Read and analyze Yesco's answer to first amended complaint.		
	Steven G. Gersten	.40 hrs.	\$ 945.00/hr.

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02/22/23	Review document requests with S. Gersten (.2); revise answers to requests for admission and interrogatories (1.3).		
	Amanda L. Cottrell	1.50 hrs.	\$ 1045.00/hr.
02/22/23	Reviewed draft discovery responses (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
02/22/23	Draft objections and responses to Yesco's requests for production in advance of tomorrow's response deadline.		
	Steven G. Gersten	2.70 hrs.	\$ 945.00/hr.
02/23/23	Revise and finalize objections and responses to Yesco's first set of written discovery.		
	Amanda L. Cottrell	2.00 hrs.	\$ 1045.00/hr.
02/23/23	Reviewed draft responses to interrogatories and provided comments on same (.6); reviewed Yesco's responses to FGF discovery (.2)		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
02/23/23	Revise objections and responses to Yesco's requests for production, and review, edit and comment on draft interrogatory responses and answers to requests for admission, in advance of today's response deadline.		
	Steven G. Gersten	1.60 hrs.	\$ 945.00/hr.
02/27/23	Prepared for Mar. 9 client meeting (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
03/02/23	Prepared for Yesco litigation strategy meeting with B. Koo and L. Jang (.5)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
03/03/23	Prepared for client meeting (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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03/06/23	Analysis of Yesco's discovery and preparation for client meeting.		
	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
03/06/23	Draft outline for meeting with B. Koo and L. Jang in advance of deposition.		
	Steven G. Gersten	7.10 hrs.	\$ 945.00/hr.
03/07/23	Draft and revise outline for witness preparation, fact analysis and document collection in advance of client meeting.		
	Amanda L. Cottrell	3.00 hrs.	\$ 1045.00/hr.
03/07/23	Continued drafting outline for meeting with B. Koo and L. Jang in advance of depositions.		
	Steven G. Gersten	3.40 hrs.	\$ 945.00/hr.
03/08/23	Draft and revise outline and notes for client meeting re: deposition prep, fact analysis, and document collection.		
	Amanda L. Cottrell	1.20 hrs.	\$ 1045.00/hr.
03/08/23	Reviewed and analyzed witness preparation outline (.3); corresponded with B. Koo and L. Jang regarding Mar. 9 witness preparation meeting (.2); prepared documents for same (.8); prepared for witness preparation meeting (.1)		
	Jeannie Kim	1.40 hrs.	\$ 945.00/hr.
03/09/23	Attention to litigation strategy (.6).		
	Ori Katz	.60 hrs.	\$ 1355.00/hr.
03/09/23	Prepare for and attend in-person meeting with O. Katz, J. Kim, B. Koo and L. Jang in San Francisco re: deposition prep, fact analysis and document collection.		
	Amanda L. Cottrell	4.90 hrs.	\$ 1045.00/hr.

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03/09/23 Corresponded with B. Koo regarding witness preparation meeting (.1); prepared for same meeting (.1); meeting with B. Koo, L. Jang, A. Cottrell, and O. Katz regarding Yesco Litigation strategy and witness preparation (3.7).

Jeannie Kim 3.90 hrs. \$ 945.00/hr.

03/13/23 Conference with S. Gersten to discuss attorney notes from client meeting and deposition prep with focus on outline to identify next steps for document review and anticipated party depositions.

Amanda L. Cottrell 1.50 hrs. \$ 1045.00/hr.

03/13/23 Corresponded with L. Jang and B. Koo regarding deposition preparation and discovery responses (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

03/13/23 Begin drafting second sets of requests for production and interrogatories.

Steven G. Gersten 1.50 hrs. \$ 945.00/hr.

03/14/23 Attention to open discovery (.1); respond to Proskauer's discovery questions (.3).

Amanda L. Cottrell .40 hrs. \$ 1045.00/hr.

03/14/23 Corresponded with L. Jang regarding discovery (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

03/14/23 Review Yesco's discovery objections and responses to address deficiencies; draft additional discovery requests; read and analyze Yesco's email re alleged deficiencies in Formation's responses to their discovery requests; draft email response to Yesco's email conferral on discovery; confer with Consilio re engagement for document collection to respond to discovery.

Steven G. Gersten 5.40 hrs. \$ 945.00/hr.

03/15/23 Draft and revise new interrogatories and document requests to Yesco.

Amanda L. Cottrell .50 hrs. \$ 1045.00/hr.

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03/17/23	Review draft engagement letter for Consilio re document collection in support of discovery obligations in adversary proceeding; confer with O. Katz and J. Kim re same; call with L. Jang and Consilio team re document collection.
	Steven G. Gersten 2.80 hrs. \$ 945.00/hr.
03/22/23	Conference with S. Gersten re: Consilio and data collection.
	Amanda L. Cottrell .20 hrs. \$ 1045.00/hr.
03/22/23	Draft notice of intent to take deposition of Yesco's corporate representative, including topics for deposition; confer with A. Cottrell re strategy for meet and confer with Yesco's counsel re discovery; meet and confer with E. Stevens re the parties' discovery requests, objections, and responses.
	Steven G. Gersten 3.50 hrs. \$ 945.00/hr.
03/23/23	Conference with S. Gersten re: Proskauer's meet and confer on discovery.
	Amanda L. Cottrell .20 hrs. \$ 1045.00/hr.
03/23/23	Reviewed correspondence to B. Koo and L. Jang regarding documents in support of Yesco claim objection (.1); reviewed file regarding translated client documents (.1)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
03/23/23	Draft notice of intent to take deposition of Yesco's corporate representative, including topics for deposition.
	Steven G. Gersten .50 hrs. \$ 945.00/hr.
03/29/23	Corresponded with A. De Camara and B. Koo regarding claim objection litigation strategy (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
04/03/23	Corresponded with A. Cottrell regarding upcoming discovery deadlines (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.

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04/10/23	Conference with Consilio to begin collection of electronically stored information, emails and documents.		
	Amanda L. Cottrell	.30 hrs.	\$ 1045.00/hr.
04/17/23	Conferred with Sheppard Mullin team regarding status of discovery responses (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/17/23	Confer with Consilio re status of document collection and processing for review; email status update to O. Katz, J. Kim and A. Cottrell; read and analyze Yesco's responses to the debtors' second requests for production and second interrogatories.		
	Steven G. Gersten	.30 hrs.	\$ 945.00/hr.
04/19/23	Meet and confer with Yesco (.2).		
	Ori Katz	.20 hrs.	\$ 1355.00/hr.
04/19/23	Follow up re potential settlement (.5).		
	Ori Katz	.50 hrs.	\$ 1355.00/hr.
04/19/23	Correspondence with O. Katz and S. Gersten re: status of discovery and pretrial deadlines.		
	Amanda L. Cottrell	.40 hrs.	\$ 1045.00/hr.
04/19/23	Reviewed strategy regarding discovery (.2); reviewed and revised draft stipulation to continue pretrial scheduling order dates (.2); telephone conference with U.S. Bankruptcy Court (A. Rosales) regarding new trial and hearing dates (.1); reviewed correspondence with E. Stevens regarding request to extend discovery deadlines (.2)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
04/20/23	Conferred with S. Gersten regarding discovery strategy (.5); reviewed correspondence with E. Stevens regarding discovery deadlines (.1)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.



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04/20/23	Review and analyze B. Koo and L. Jang emails for responsiveness and privilege in preparation for producing documents responsive to Yesco's discovery requests and to inform additional discovery requests to be served by the upcoming Friday deadline to serve discovery.		
	Steven G. Gersten	6.30 hrs.	\$ 945.00/hr.
04/21/23	Reviewed discovery strategy (.2); reviewed correspondence to Yesco regarding debtors' RFP Third RFP and First RFA (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
04/21/23	Review and analyze B. Koo and L. Jang emails for responsiveness and privilege; draft third requests for production and first requests for admission and serve on Yesco.		
	Steven G. Gersten	6.90 hrs.	\$ 945.00/hr.
04/24/23	Conference with S. Gersten re: document production and issues for briefing.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
04/25/23	Attention to potential settlement proposal to be made to Yesco (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
04/25/23	Reviewed correspondence to E. Stevens regarding rescheduling discovery deadlines and trial (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/26/23	Attention to discovery matters ahead of upcoming discovery deadline (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
04/26/23	Corresponded with E. Stevens regarding proposed extension of discovery deadlines and rescheduling of trial date (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.

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04/26/23	Review and analyze B. Koo and L. Jang emails for responsiveness and privilege in preparation for producing documents responsive to Yesco's discovery requests; draft letter to court re request for extension of pretrial schedule.		
	Steven G. Gersten	4.10 hrs.	\$ 945.00/hr.
04/27/23	Attention to potential settlement proposal to be made to Yesco (2.5).		
	Ori Katz	2.50 hrs.	\$ 1355.00/hr.
04/27/23	Review and revise joint letter to Court seeking continuation of pretrial deadlines.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
04/27/23	Reviewed correspondence with T. Keller regarding comments on proposed correspondence to U.S. Bankruptcy Court regarding discovery and trial schedule (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/27/23	Revise joint letter to the bankruptcy court regarding request for continuance; review documents collected for client for responsiveness and privilege to produce same in response to Yesco's discovery requests.		
	Steven G. Gersten	1.80 hrs.	\$ 945.00/hr.
04/28/23	Corresponded with E. Stevens regarding Yesco's initial production of documents in connection with pending adversary proceeding (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/01/23	Attention to discovery matters in adversary proceeding (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.
05/01/23	Email instructions for processing first document production to Consilio.; review Yesco's edits to joint letter to court re request for continuance; confer with O. Katz re proposed edits to letter to address Yesco's edits; revise joint letter to court re request for continuance;		
	Steven G. Gersten	2.40 hrs.	\$ 945.00/hr.

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05/02/23	Call with Mr. Koo re potential settlement proposal (.3).		
	Ori Katz	.30 hrs.	\$ 1355.00/hr.
05/02/23	Meet and confer with Yesco re discovery related matters (.4).		
	Ori Katz	.40 hrs.	\$ 1355.00/hr.
05/02/23	Conference with O. Katz and T. Keller re: joint letter to continue pretrial dates.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
05/02/23	Confer with E. Kane (Consilio) re document production specifications.		
	Steven G. Gersten	.20 hrs.	\$ 945.00/hr.
05/04/23	Draft cover email and serve initial document production on Yesco; revise draft joint letter to the court re request for continuance in response to Yesco's most recent edits and revisions, as well as comments from T. Keller.		
	Steven G. Gersten	.60 hrs.	\$ 945.00/hr.
05/05/23	Reviewed proposed revisions to discovery dispute letter (.1); reviewed correspondence to E. Stevens regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/05/23	Confer with E. Stevens re draft joint letter to court re request for continuance; begin drafting notice of deposition of Yesco's corporate representative.		
	Steven G. Gersten	1.60 hrs.	\$ 945.00/hr.
05/08/23	Reviewed Yesco's revisions to joint letter regarding discovery dispute (.2); corresponded with Yesco's counsel regarding same (.4); correspondence to A. Rosales (USBC) regarding discovery dispute (.1)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
05/08/23	Review and analyze Yesco's redlined edits to draft joint letter to the court re request for continuance.		
	Steven G. Gersten	.30 hrs.	\$ 945.00/hr.

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05/09/23	Telephone conference with A. Rosales regarding discovery dispute letter (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/10/23	Review revised pre-trial schedule from Judge Hammond.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
05/10/23	Corresponded with A. Rosales regarding proposed revised pretrial schedule (.1); reviewed and analyzed draft of same prepared by court (.1); reviewed correspondence with E. Stevens regarding discovery disputes (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/10/23	Email conferral with E. Stevens re Debtors' requests for admission and Yesco's objections and lack of responses to the Debtors' second interrogatories.		
	Steven G. Gersten	.30 hrs.	\$ 945.00/hr.
05/12/23	Reviewed correspondence with E. Stevens regarding results of meet and confer regarding discovery requests (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/12/23	Meet and confer with E. Stevens re Yesco's objections and lack of responses to Formation's second interrogatories and re Formation's first set of requests for admission.		
	Steven G. Gersten	.50 hrs.	\$ 945.00/hr.
05/15/23	Reviewed court's proposed revisions to pretrial schedule (.1); corresponded with A. Rosales regarding same (.2); conferred with S. Gersten regarding same (.3); corresponded with D. Picon regarding same (.1)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
05/16/23	Reviewed and responded to correspondence from A. Rosales regarding court's response to requested amended pretrial scheduling order (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.

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05/18/23	Reviewed correspondence with D. Picon and A. Rosales regarding amended pretrial scheduling order (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/22/23	Draft and revise 30(b)(6) deposition notice.		
	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
05/22/23	Reviewed draft notice of deposition to Yesco (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/22/23	Reviewed correspondence from D. Picon regarding Yesco discovery responses (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/23/23	Reviewed and analyzed amended pretrial scheduling order entered by court (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/25/23	Review and revise draft status report.		
	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
05/26/23	Reviewed status of discovery (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/26/23	Read and analyze Yesco's responses to third requests for production and amended responses to second interrogatories; review and analyze Yesco's production; read and analyze documents collected from client for responsiveness and privilege in preparation for serving supplemental production.		
	Steven G. Gersten	5.80 hrs.	\$ 945.00/hr.
05/30/23	Review client documents for responsiveness and privilege in preparation for making supplemental production.		
	Steven G. Gersten	1.60 hrs.	\$ 945.00/hr.

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05/31/23	Review client documents for responsiveness and privilege in preparation for making supplemental production.		
	Steven G. Gersten	6.90 hrs.	\$ 945.00/hr.
06/01/23	Review and analyze client documents for responsiveness and privilege to prepare for supplemental production.		
	Steven G. Gersten	3.00 hrs.	\$ 945.00/hr.
06/02/23	Review and analyze client documents for responsiveness and privilege to prepare for supplemental production.		
	Steven G. Gersten	1.50 hrs.	\$ 945.00/hr.
06/12/23	Reviewed response to correspondence from E. Stevens regarding status of discovery responses (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/13/23	Corresponded with E. Stevens regarding status of Yesco production (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/14/23	Reviewed 30(b)(6) subpoena (.1); reviewed Yesco discovery response (set 3) (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
06/15/23	Reviewed correspondence to E. Stevens regarding Yesco deposition and other open discovery matters (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/15/23	Finalize and serve 30(b)(6) deposition notice; email opposing counsel re discovery issues, including Yesco's objections and responses to FGF's third RFPs and status of supplemental production.		
	Steven G. Gersten	.40 hrs.	\$ 945.00/hr.

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06/16/23	Review client documents for responsiveness and privilege to prepare supplemental production.		
	Steven G. Gersten	3.40 hrs.	\$ 945.00/hr.
06/19/23	Reviewed correspondence from E. Stevens regarding discovery conference (.1); reviewed strategy to respond to same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
06/19/23	Review client documents for responsiveness and privilege to prepare supplemental production.		
	Steven G. Gersten	5.70 hrs.	\$ 945.00/hr.
06/20/23	Reviewed correspondence from E. Stevens regarding outcome of meet & confer regarding debtors' subpoena to depose Yesco (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/20/23	Review client documents for responsiveness and privilege to prepare supplemental production; review and analyze Yesco's objections and responses to FGF's third requests for production in advance of meet and confer with E. Stevens; email E. Stevens list of issues for discussion during meet and confer; confer with E. Stevens re Yesco's objections and responses and FGF's corporate representative deposition topics.		
	Steven G. Gersten	4.20 hrs.	\$ 945.00/hr.
06/21/23	Review client documents for responsiveness and privilege to prepare supplemental production.		
	Steven G. Gersten	5.80 hrs.	\$ 945.00/hr.
06/22/23	Reviewed correspondence with B. Koo and L. Jang regarding Yesco subpoenas (.1); reviewed correspondence from E. Stevens regarding discovery (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
06/22/23	Review client documents for responsiveness and privilege to prepare supplemental production.		
	Steven G. Gersten	1.00 hrs.	\$ 945.00/hr.

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06/22/23	Research Korean law.		
	Lauryn Vigil	.40 hrs.	\$ 210.00/hr.
06/23/23	Attention to upcoming trial (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.
06/23/23	Conference with O. Katz re: client depositions and summary judgment strategy.		
	Amanda L. Cottrell	.30 hrs.	\$ 1045.00/hr.
06/23/23	Reviewed correspondence with E. Stevens regarding discovery (.2); reviewed correspondence with L. Jang regarding discovery deadlines and Yesco deposition request (.3)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
06/23/23	Review and analyze documents for responsiveness and privilege to prepare supplemental production.		
	Steven G. Gersten	5.50 hrs.	\$ 945.00/hr.
06/23/23	Research Korean law.		
	Lauryn Vigil	3.40 hrs.	\$ 210.00/hr.
06/26/23	Conference with O. Katz and S. Gersten re: status of discovery and summary judgment strategy.		
	Amanda L. Cottrell	.70 hrs.	\$ 1045.00/hr.
06/26/23	Reviewed correspondence from E. Stevens regarding outstanding discovery (.2); conferred with Sheppard team regarding same (.2); reviewed correspondence to E. Stevens regarding privilege log (.1)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.



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06/26/23	Confer with A. Cottrell and O. Katz re discovery and deposition scheduling issues; review client documents for responsiveness and privilege to prepare supplemental production; email production directions to Consilio and confirm production set; begin reviewing and analyzing Yesco's document production.		
	Steven G. Gersten	7.20 hrs.	\$ 945.00/hr.
06/26/23	Draft and serve request for privilege log on Yesco.		
	Steven G. Gersten	.30 hrs.	\$ 945.00/hr.
06/27/23	Reply to Elliott Stevens discovery email; review draft discovery letter.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
06/27/23	Reviewed correspondence with Yesco counsel regarding discovery deadlines and 30(b)(6) depositions (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
06/27/23	Confer with A. Cottrell and O. Katz re discovery and deposition scheduling issues; review and analyze Yesco's document production; draft cover email and serve FGF's supplemental production.		
	Steven G. Gersten	5.60 hrs.	\$ 945.00/hr.
06/27/23	Continue research re Korean regulatory law.		
	Lauryn Vigil	3.90 hrs.	\$ 210.00/hr.
06/28/23	Draft and send letter to Yesco re discovery deficiencies.		
	Steven G. Gersten	.80 hrs.	\$ 945.00/hr.
06/29/23	Reviewed comments in response to Yesco request for production of documents (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/30/23	Review and analyze Yesco's document production.		
	Steven G. Gersten	4.60 hrs.	\$ 945.00/hr.

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07/03/23	Confer with A. Cottrell and O. Katz re deposition scheduling dispute and draft letter to court re other discovery issues; review client documents and Yesco document production, and conduct background research on Yesco, and prepare cross-examination outline for deposition of Yesco's corporate representative.
	Steven G. Gersten 4.40 hrs. \$ 945.00/hr.
07/05/23	Conferred with Sheppard Mullin team regarding discovery deadlines (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
07/05/23	Confer with A. Cottrell, O. Katz and J. Kim re potential affirmative experts; continue reviewing and analyzing client documents, including document productions, and Yesco document productions, conducting research on Yesco, and drafting cross-examination outline for deposition of Yesco's corporate representative.
	Steven G. Gersten 4.80 hrs. \$ 945.00/hr.
07/06/23	Continue reviewing and analyzing client documents, including document productions, and Yesco document productions, conducting research on Yesco and LS Group, and drafting cross-examination outline for deposition of Yesco's corporate representative.
	Steven G. Gersten 4.10 hrs. \$ 945.00/hr.
07/07/23	Reviewed letter from D. Picon in response to debtors' discovery letter (.1); reviewed correspondence from E. Stevens regarding request for privilege log (.1)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
07/07/23	Continue reviewing and analyzing client documents, including document productions, and Yesco document productions, including production made today, conducting research on Yesco, and drafting cross-examination outline for deposition of Yesco's corporate representative; read and analyze letter from D. Picon re discovery issues in response to discovery conferral letter on June 28.
	Steven G. Gersten 4.70 hrs. \$ 945.00/hr.

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07/10/23	Continue reviewing and analyzing client documents, including document productions, and Yesco document productions, conducting research on Yesco and LS Group, and drafting cross-examination outline for deposition of Yesco's corporate representative.		
	Steven G. Gersten	5.70 hrs.	\$ 945.00/hr.
07/11/23	Review and edit draft letter to court re: discovery issues.		
	Amanda L. Cottrell	.90 hrs.	\$ 1045.00/hr.
07/11/23	Read and analyze Yesco's document production and draft outline of key facts, issues for discussion with client, and cross-examination outline for deposition of Yesco's corporate representative; confer with A. Cottrell re draft letter motion to the Court re compelling Yesco's discovery responses and deposition.		
	Steven G. Gersten	8.20 hrs.	\$ 945.00/hr.
07/11/23	Research into Korean law.		
	Lauryn Vigil	2.20 hrs.	\$ 210.00/hr.
07/12/23	Conference with S. Gersten (.3); revise discovery letter to Court (.5); meet and confer with Proskauer (.7); correspondence to all counsel (.6).		
	Amanda L. Cottrell	2.10 hrs.	\$ 1045.00/hr.
07/12/23	Continue reviewing and analyzing client documents, and Yesco document productions, conducting research on Yesco, and drafting cross-examination outline for deposition of Yesco's corporate representative; draft letter to Proskauer re document review and production protocol; email Transperfect re arranging interpreters for depositions and certified translations of documents.		
	Steven G. Gersten	6.40 hrs.	\$ 945.00/hr.
07/12/23	Continue research into Korean law.		
	Lauryn Vigil	2.50 hrs.	\$ 210.00/hr.

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07/13/23	Respond to E. Stevens re discovery (.1); review and edit draft conferral letter (.4); conference with S. Gersten on deposition prep for Chairman Koo and summary judgment evidence (.9).	Amanda L. Cottrell	1.40 hrs.	\$ 1045.00/hr.
07/13/23	Reviewed response to Yesco discovery letter (.1)	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/13/23	Conduct additional searches of client documents; email B. Koo and L. Jang re deposition scheduling.	Steven G. Gersten	4.30 hrs.	\$ 945.00/hr.
07/14/23	Confer with clients on deposition dates; email correspondence to opposing counsel offer new deposition dates; meet and confer with D. Picon on deposition and other discovery disputes.	Amanda L. Cottrell	.70 hrs.	\$ 1045.00/hr.
07/14/23	Reviewed correspondence with L. Jang and B. Koo regarding depositions (.2); reviewed correspondence with D. Picon regarding outstanding discovery issues (.4)	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
07/14/23	Read and analyze response email from D. Picon re discovery issues; complete review of documents and finalize supplemental production set; correspond with Consilio team re production parameters and instructions to ensure production.	Steven G. Gersten	5.60 hrs.	\$ 945.00/hr.
07/15/23	Reviewed correspondence with B. Koo regarding deposition/outstanding discovery issues (.1)	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/17/23	Attention to discovery (1.0).	Ori Katz	1.00 hrs.	\$ 1355.00/hr.

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07/17/23	Reviewed correspondence with B. Koo regarding deposition/outstanding discovery issues (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/17/23	Review and confirm third production volume prepared by Consilio; confer with O. Katz re questions on document production; draft cover email and transmit production to Yesco's counsel.		
	Steven G. Gersten	1.00 hrs.	\$ 945.00/hr.
07/18/23	Reviewed correspondence from E. Stevens regarding open discovery issues and proposal for consensual resolution of same (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/19/23	Reviewed correspondence with B. Koo regarding outstanding discovery (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/20/23	Reviewed correspondence from B. Koo regarding deposition scheduling (.3); reviewed correspondence to Yesco counsel regarding deposition schedules/outstanding discovery disputes (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
07/21/23	Reviewed correspondence from E. Stevens regarding open discovery issues (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/24/23	Address discovery disputes, deposition schedule and extension of pretrial deadlines.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
07/24/23	Reviewed and analyzed correspondence from E. Stevens regarding open discovery issues and proposed resolutions of same (.1); corresponded with A. Cottrell regarding outstanding discovery disputes (.1); reviewed correspondence to Yesco's counsel regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.

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07/24/23	Read and analyze E. Steven's emails re discovery and scheduling issues; draft and send letter in response to correct mischaracterizations of Plaintiffs' positions and memorialize issues on which the parties agree and disagree.		
	Steven G. Gersten	1.50 hrs.	\$ 945.00/hr.
07/25/23	Corresponded with L. Jang regarding Yesco deposition (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
07/25/23	Corresponded with E. Stevens regarding open discovery and scheduling issues (.1); conferred with S. Gersten regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
07/26/23	Review and revise stipulation on discovery and pretrial deadlines.		
	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
07/26/23	Corresponded with E. Stevens regarding stipulation to amend pretrial scheduling order (.3); reviewed and analyzed court's open calendar procedures to determine possible trial dates (.2); conferred with Sheppard Mullin team regarding same (.7); draft correspondence to U.S. Bankruptcy Court to request new pretrial scheduling order (.3)		
	Jeannie Kim	1.50 hrs.	\$ 945.00/hr.
07/26/23	Draft stipulation and agreed motion for continuance of pretrial and trial schedules; confer with E. Stevens re same.		
	Steven G. Gersten	4.20 hrs.	\$ 945.00/hr.
07/27/23	Reviewed correspondence with E. Stevens regarding resolution of outstanding discovery disputes and deadlines (.2); conferred with Sheppard Mullin team regarding same (.5); multiple telephone conferences with A. Rosales regarding court's availability for trial (.2); corresponded with A. Rosales regarding same (.1); conferred with Sheppard Mullin team regarding same (.1)		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.

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07/27/23	Confer with O. Katz, A. Cottrell, and J. Kim re Yesco's proposed revisions to schedule for continuance; confer with E. Stevens re same; confer with Z. Saumell re interpreters for upcoming depositions.		
	Steven G. Gersten	.90 hrs.	\$ 945.00/hr.
07/28/23	Reviewed correspondence between E. Stevens to A. Rosales (USBC) regarding December trial dates (.2); conferred with Sheppard Mullin team regarding same (.1); reviewed draft stipulation to continue fact discovery deadline (.1); reviewed correspondence with E. Stevens and D. Picon regarding same (.2); finalize same for filing and service (.2); prepared order approving stipulation (.2); corresponded with Proskauer team regarding same (.1); reviewed correspondence from E. Stevens regarding discovery and trial scheduling disputes (.2)		
	Jeannie Kim	1.30 hrs.	\$ 945.00/hr.
07/28/23	Confer with E. Stevens re stipulation to extend discovery and the continuation of remaining pretrial and trial schedule; review and edit draft stipulation; confer with J. Kim re local rules and potential order approving stipulation; confer with O. Katz and A. Cottrell re contested motion to continue and ancillary discovery issues.		
	Steven G. Gersten	1.20 hrs.	\$ 945.00/hr.
07/31/23	Draft and revise objections and responses to Yesco's 2nd RFPs.		
	Amanda L. Cottrell	1.00 hrs.	\$ 1045.00/hr.
07/31/23	Corresponded with E. Stevens regarding joint discovery letter (.1); conferred with S. Gersten regarding same (.1); reviewed objection to Yesco's second request for production (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
07/31/23	Draft and serve objections and responses to Yesco's second set of document requests.		
	Steven G. Gersten	1.00 hrs.	\$ 945.00/hr.
08/02/23	Reviewed correspondence with B. Koo regarding depositions (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.

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08/04/23	Review and analyze revised interrogatories (.2); correspondence with S. Gersten re: same (.1); review joint letter (.1); review and analyze Yesco's revised interrogatories (.1).	Amanda L. Cottrell	.50 hrs.	\$ 1045.00/hr.
08/04/23	Conferred with Sheppard Mullin team regarding amended interrogatories (.3) and discovery dispute (.1); reviewed draft discovery dispute letter to court (.2)	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
08/05/23	Corresponded with S. Gersten regarding interpreters (.1)	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/09/23	Attention to remaining discovery issues (1.6).	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
08/09/23	Review and revise on draft 4th RFP to Yesco (.5); review document production and information for same (.6); conference with S. Gersten re same (.3).	Amanda L. Cottrell	1.40 hrs.	\$ 1045.00/hr.
08/10/23	Strategy re upcoming trial and pre-trial motions (1.5).	Ori Katz	1.50 hrs.	\$ 1355.00/hr.
08/10/23	Revise Plaintiff's Fourth RFP.	Amanda L. Cottrell	1.00 hrs.	\$ 1045.00/hr.
08/11/23	Call with Amanda Cottrell re discovery questions.	Johneth C. Park	.40 hrs.	\$ 1175.00/hr.
08/14/23	Attention to potential motion for summary judgment (.7).	Ori Katz	.70 hrs.	\$ 1355.00/hr.



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08/14/23 Correspondence with J. Park discovery (.2); conference with S. Gersten re: motion on spoliation and continued trial schedule (.3); attention to deposition prep re: Lae (.3); conference with S. Gersten and O. Katz re: spoliation issue (.5).

Amanda L. Cottrell 1.30 hrs. \$ 1045.00/hr.

08/14/23 Continued preparation of S. Gersten pro hac vice application (.2)

Jeannie Kim .20 hrs. \$ 945.00/hr.

08/14/23 Draft motion for continuance and motion for sanctions.

Steven G. Gersten 7.30 hrs. \$ 945.00/hr.

08/15/23 Reviewed and revised draft pro hac vice application for S. Gersten and proposed order regarding same.

Jeannie Kim .30 hrs. \$ 945.00/hr.

08/15/23 Draft motion for continuance and motion for sanctions.

Steven G. Gersten 11.10 hrs. \$ 945.00/hr.

08/16/23 Preparation for upcoming depositions (.9).

Ori Katz .90 hrs. \$ 1355.00/hr.

08/16/23 Review and comment on the RFP re questions specific to Korean regulation.

Johneth C. Park .50 hrs. \$ 1175.00/hr.

08/16/23 Correspondence with J. Park re discovery (.3); continue to prepare for depositions (.8); finalization of motion to continue and supporting declaration (.3).

Amanda L. Cottrell 1.40 hrs. \$ 1045.00/hr.

08/16/23 Reviewed draft sanctions motion (.3)

Jeannie Kim .30 hrs. \$ 945.00/hr.

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08/16/23	Draft and revise motion for sanctions.		
	Steven G. Gersten	7.90 hrs.	\$ 945.00/hr.
08/17/23	Attention to sanctions motion (1.1).		
	Ori Katz	1.10 hrs.	\$ 1355.00/hr.
08/17/23	Draft and revise motion to continue (.4); research and spoliation sanctions motion (4.2).		
	Amanda L. Cottrell	4.60 hrs.	\$ 1045.00/hr.
08/17/23	Reviewed and revised motion to continue trial (.2); reviewed and revised proposed order granting same (.9); checked court's open calendar in connection with same motion to continue (.1); reviewed correspondence with S. Elliot regarding deposition of B. Koo and L. Jang and joint discovery letter to court (.2)		
	Jeannie Kim	1.40 hrs.	\$ 945.00/hr.
08/17/23	Revise motion for sanctions.		
	Steven G. Gersten	6.80 hrs.	\$ 945.00/hr.
08/18/23	Review and finalize motion to continue (1.0); draft conferral email to Proskauer (.3); draft and revise motion for sanctions (1.5).		
	Amanda L. Cottrell	2.90 hrs.	\$ 1045.00/hr.
08/18/23	Reviewed correspondence with Yesco counsel regarding joint discovery letter to court (.2); revised proposed order granting ex parte application for order shortening time (.4); drafted declaration of J. Kim in support of ex parte application for order shortening time regarding motion to continue (.8); drafted ex parte application regarding order shortening time (1.1); revised proposed order granting motion to continue (.2); reviewed and revised S. Gersten declaration regarding motion to continue (.4); reviewed and revised motion to continue (1.4); coordinated filing and service of same (.5); reviewed correspondence from T. Keller regarding ex parte application (.2); reviewed correspondence from E. Stevens regarding discovery requests (.1); reviewed draft motion for discovery sanctions (.2)		
	Jeannie Kim	5.50 hrs.	\$ 945.00/hr.

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08/19/23	Corresponded with T. Keller regarding Yesco response to ex parte application for order shortening time regarding motion to continue trial (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/20/23	Prepared certificate of service regarding notice of revised proposed order (.2); coordinated filing and service of same (.2); lodged proposed order granting ex parte application for order shortening time (.2)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
08/21/23	Conference with S. Gersten and O. Katz re: deposition strategy and preparation; prepare materials for deposition prep of Plaintiffs with focus on key legal issues and case themes.		
	Amanda L. Cottrell	3.40 hrs.	\$ 1045.00/hr.
08/21/23	Coordinated filing and service of notice of revised proposed order (.2); corresponded with A. Cottrell regarding same (.1); reviewed strategy regarding L. Jang deposition (.2); corresponded with T. Keller regarding ex parte application for order shortening time regarding motion to continue trial (.2)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
08/21/23	Review and analyze documents for use in deposition prep; refine document production parameters.		
	Steven G. Gersten	6.00 hrs.	\$ 945.00/hr.
08/22/23	Review and comment on the RFP re questions specific to Korean regulation.		
	Johneth C. Park	.50 hrs.	\$ 1175.00/hr.
08/22/23	Deposition prep zoom conference with S. Gersten and clients (4.5); prepared to defend Plaintiffs' deposition and drafted motion for sanctions (4.0).		
	Amanda L. Cottrell	8.50 hrs.	\$ 1045.00/hr.
08/22/23	Prepare for and participate in deposition preparation meeting with L. Jang and B. Koo.		
	Steven G. Gersten	9.50 hrs.	\$ 945.00/hr.

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08/23/23	Prepare for and defend Plaintiffs' 30(b)(6) deposition (11.0).		
	Amanda L. Cottrell	11.00 hrs.	\$ 1045.00/hr.
08/23/23	Defend corporate representative deposition.		
	Steven G. Gersten	10.20 hrs.	\$ 945.00/hr.
08/24/23	Attention to deposition matters (1.5).		
	Ori Katz	1.50 hrs.	\$ 1355.00/hr.
08/24/23	Conferences with S. Gersten and L. Jang re: deposition and discovery.		
	Amanda L. Cottrell	1.50 hrs.	\$ 1045.00/hr.
08/24/23	Conferred with S. Gersten regarding report of second day of L. Jang deposition testimony (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/24/23	Defend L. Jang deposition; meet with L. Jang ahead of deposition; debrief with L. Jang; travel back to Dallas.		
	Steven G. Gersten	6.40 hrs.	\$ 945.00/hr.
08/25/23	Correspondence to B. Koo and L. Jang re litigation hold (.2); draft correspondence with opposing counsel re: same (.2); attention to depo interpreter (.1); draft and revise notice of motion and motion for sanctions (1.7).		
	Amanda L. Cottrell	2.20 hrs.	\$ 1045.00/hr.
08/25/23	Revised draft notice of sanctions motion (1.3)		
	Jeannie Kim	1.30 hrs.	\$ 945.00/hr.
08/25/23	Review and analyze document productions to identify documents for use in cross exam of Yesco corporate representative; review and reduce planned production.		
	Steven G. Gersten	10.40 hrs.	\$ 945.00/hr.

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08/28/23	Revise and finalize motion for sanctions, notice of motion, proposed order, supporting declaration (5); correspondence to Proskauer confirming data preservation (.1).		
	Amanda L. Cottrell	5.10 hrs.	\$ 1045.00/hr.
08/28/23	Reviewed correspondence to Yesco counsel regarding plaintiffs' preservation of records and files (.1); reviewed draft motion for sanctions (1.6); revised draft proposed order granting same (.3); revised declaration of S. Gersten in support of same (.2); coordinated filing and service of same (1.0)		
	Jeannie Kim	3.20 hrs.	\$ 945.00/hr.
08/28/23	Draft proposed order to motion for sanctions; revise motion for sanctions; draft declaration and prepare exhibits in support of motion for sanctions; prepare for deposition preparation meeting tomorrow with B. Koo.		
	Steven G. Gersten	8.20 hrs.	\$ 945.00/hr.
08/29/23	Correspondence to Proskauer re: Yesco's 30(b)(6) interpreter (.1); revise and serve amended Yesco 30(b)(6) deposition notice (.3); zoom conference to prepare B. Koo for his individual deposition (4.4).		
	Amanda L. Cottrell	4.80 hrs.	\$ 1045.00/hr.
08/29/23	Coordinated mail service of discovery sanctions motion on Yesco's counsel (.1); reviewed Yesco's opposition to motion to continue trial (.1); correspondence to A. De Camara, B. Koo, and J. Wada regarding same and sanctions motion (.2)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
08/29/23	Meet with B. Koo to prepare for his August 30 deposition; identify and send documents for certified translations for use during deposition of Yesco's corporate representative; review and analyze documents to prepare supplemental production to Yesco.		
	Steven G. Gersten	11.80 hrs.	\$ 945.00/hr.

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08/30/23	Correspondence re: service of deposition subpoenas on Yesco's additional persons (.5); conference with B. Koo re: deposition issue (.8); attention to interpreter for Chairman Koo's deposition (.2); analyze Yesco's opposition to motion to continue (.5); conference with O. Katz re: same (.3).
	Amanda L. Cottrell 2.30 hrs. \$ 1045.00/hr.
08/30/23	Prepared subpoena for examination regarding Se Young Choi (.4); prepared subpoena for examination regarding Gu Hwan Nam (.4); coordinated service of same (1.4); reviewed correspondence from AAA regarding status of arbitration (.1); reviewed proposed responses to Yesco discovery requests (.2); corresponded with process server regarding proof of service regarding subpoenas (.2); reviewed correspondence with E. Stevens regarding Yesco depositions (.1)
	Jeannie Kim 2.80 hrs. \$ 945.00/hr.
08/30/23	Meet with B. Koo in advance of deposition; defend B. Koo's deposition; review and analyze documents to prepare supplemental production to Yesco.
	Steven G. Gersten 11.50 hrs. \$ 945.00/hr.
08/31/23	Corresponded with A. Rosales (USBC) regarding appearances at hearing on motion to continue trial (.2); developed strategy regarding filing of potential confidential information in connection with sanctions motion (.3); prepared certificate of service regarding reply to Yesco's limited opposition to plaintiffs' motion for continuance (.2)
	Jeannie Kim .70 hrs. \$ 945.00/hr.
08/31/23	Read and analyze Yesco's response to motion for continuance; prepare and finalize production set for supplemental production to Yesco; draft cross examination outline for deposition of Yesco's corporate representative.
	Steven G. Gersten 11.00 hrs. \$ 945.00/hr.
09/01/23	Attention to discovery disputes (1.0).
	Ori Katz 1.00 hrs. \$ 1355.00/hr.

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09/01/23 Draft reply and supplement to reply iso motion to continue the trial setting and remaining pretrial deadlines including internal conferences re: Yesco's newly disclosed files (2.5); attention to supplemental production sets (.5).

Amanda L. Cottrell 3.00 hrs. \$ 1045.00/hr.

09/01/23 Reviewed draft reply to Yesco opposition to Plaintiffs' motion to continue trial (.2); coordinated filing and service of same (.4); reviewed correspondence with E. Stevens regarding subpoena served on G. Nam and S. Choi (.2); coordinated filing and service of proofs of service of subpoenas to testify served on same (.3); reviewed strategy regarding claim subordination litigation (.1); reviewed strategy to respond to supplemental discovery requests (.2)

Jeannie Kim 1.40 hrs. \$ 945.00/hr.

09/01/23 Finalize production in response to Yesco's second RFPs and follow up requests; confer with O. Katz and A. Cottrell re same; confer with Consilio re productions; draft cover letters to Proskauer re supplemental production and replacement production; draft cross examination outline for Yesco's 30(b)(6) deposition.

Steven G. Gersten 8.80 hrs. \$ 945.00/hr.

09/04/23 Review email and letter correspondence from Proskauer purporting to confer on matters for September 5 hearing (.5); conference with O. Katz and S. Gersten to discuss same with focus on pretrial schedule (.5).

Amanda L. Cottrell 1.00 hrs. \$ 1045.00/hr.

09/04/23 Analyze document review notes, select exhibits for, and draft cross-examination outline for deposition of Chairman Koo.

Steven G. Gersten 4.80 hrs. \$ 945.00/hr.

09/05/23 Post-hearing discussion with Mr. Picon (.3).

Ori Katz .30 hrs. \$ 1355.00/hr.

09/05/23 Outline re potential settlement (1.0).

Ori Katz 1.00 hrs. \$ 1355.00/hr.

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09/05/23	Attend hearing in adversary proceeding (.7).		
	Ori Katz	.70 hrs.	\$ 1355.00/hr.
09/05/23	Draft and revise hearing outline with focus on revised pretrial schedule, trial date, sanctions hearing, Yesco's belated document production, and remaining deposition schedule.		
	Amanda L. Cottrell	1.80 hrs.	\$ 1045.00/hr.
09/05/23	[no charge] observed hearing on motion to continue trial (.7)		
	Jeannie Kim	.00 hrs.	\$ 0.00/hr.
09/05/23	Research arguments to oppose notion to quash; prepare for hearing on motion to continue; appear at hearing; confer with O. Katz and A. Cottrell re path forward and potential settlement.		
	Steven G. Gersten	6.80 hrs.	\$ 945.00/hr.
09/06/23	Outline re potential settlement (.8).		
	Ori Katz	.80 hrs.	\$ 1355.00/hr.
09/07/23	Reviewed correspondence to B. Koo regarding translator invoice (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
09/12/23	Review and analyze Yesco's objections and responses to fourth requests for production; develop draft proposed pretrial schedule for conferral with Proskauer; email O. Katz and A. Cottrell re same.		
	Steven G. Gersten	2.20 hrs.	\$ 945.00/hr.
09/14/23	Meet and confer with D. Picon and Proskauer Rose in advance of Status Conference (.6).		
	Amanda L. Cottrell	.60 hrs.	\$ 1045.00/hr.
09/14/23	Meet and confer with D. Picon and E. Stevens re pretrial schedule and Yesco's responses to Plaintiffs' fourth requests for production.		
	Steven G. Gersten	1.00 hrs.	\$ 945.00/hr.



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09/15/23	Conference with O. Katz re: settlement (.3); draft introduction to settlement proposal focusing on theory of case and leverage (.7).		
	Amanda L. Cottrell	1.00 hrs.	\$ 1045.00/hr.
09/18/23	Review and comment on draft settlement proposal letter.		
	Amanda L. Cottrell	.20 hrs.	\$ 1045.00/hr.
09/18/23	Reviewed draft settlement proposal and provided comments on same to team (.3); corresponded with A. De Camara regarding same (.1); [no charge] reviewed and responded to invoice for service of process made on Yesco representatives (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
09/19/23	Attention to settlement proposal re Yesco complaint (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
09/19/23	Corresponded with B. Koo regarding draft settlement offer (.2); reviewed and analyzed offer letter (.1); reviewed correspondence with Yesco counsel regarding same (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
09/19/23	Read and analyze L. Jang 30(b)(6) deposition transcript to prepare errata.		
	Steven G. Gersten	3.60 hrs.	\$ 945.00/hr.
09/20/23	Correspondence to S. Gersten and O. Katz re: scheduling and discovery issues; draft email to Proskauer.		
	Amanda L. Cottrell	1.00 hrs.	\$ 1045.00/hr.
09/20/23	Reviewed and responded to correspondence from A. Rosales (USBC) regarding continued hearing date for sanctions motion (.1); reviewed correspondence with Proskauer team regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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09/20/23 Emails to Proskauer re questions on Yesco's objections and responses to fourth requests for production and scheduling issues; emails to O. Katz and A. Cottrell re same; review deposition transcripts in advance of submitting errata0

Steven G. Gersten 4.20 hrs. \$ 945.00/hr.

09/21/23 Corresponded with A. Rosales regarding continued hearing regarding motion to continue trial (.1); began preparation of notice regarding same (.1)

Jeannie Kim .20 hrs. \$ 945.00/hr.

09/21/23 Confer with A. Cottrell and O. Katz re case strategy; review deposition transcripts in advance of submitting errata and confer with L. Jang re same.

Steven G. Gersten 3.30 hrs. \$ 945.00/hr.

09/21/23 Drafted notice of continued hearing re sanctions motion.

Scott Natsuhara 2.10 hrs. \$ 650.00/hr.

09/22/23 Emails with Consilio re Yesco's new production; read and analyze Yesco's cover letter to production.

Steven G. Gersten .60 hrs. \$ 945.00/hr.

09/25/23 Coordinated filing and service of notice of continued hearing on motion to continue trial (.2); corresponded with A. Rosales regarding hearing information (.1)

Jeannie Kim .30 hrs. \$ 945.00/hr.

09/25/23 Draft and confer with A. Cottrell re proposed pretrial dates to send to Proskauer in effort to confer re same; review L. Jang's proposed errata to deposition transcripts; finalize and send errata to L. Jang for approval and signature; submit errata for deposition transcripts; review and analyze Yesco's new document production.

Steven G. Gersten 4.40 hrs. \$ 945.00/hr.

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09/26/23 Correspondence re: settlement offer (.1); address proposed scheduling order for tomorrow's status conference with S. Gersten (.2); correspondence to O. Katz re: strategy on Yesco's new production (.1); revise proposed order on motion for sanctions (.2); prepare outline for status conference (.2).

Amanda L. Cottrell .80 hrs. \$ 1045.00/hr.

09/26/23 Reviewed correspondence with Yesco's counsel regarding pre-trial scheduling (.1); reviewed strategy regarding sanctions motion and outstanding discovery disputes (.2); prepared notice of revised proposed order (.5); coordinated filing and service of same (.3); reviewed and revised proposed revised pretrial scheduling order (.4); coordinated filing and service of same (.5); reviewed correspondence with T. Keller regarding designation of exhibit in support of plaintiffs' sanctions motion (.2)

Jeannie Kim 2.20 hrs. \$ 945.00/hr.

09/26/23 Confer with A. Cottrell and O. Katz re proposed pretrial deadlines; draft letter to court concerning proposed pretrial schedule; revise and finalize proposed pretrial schedule; review and analyze Yesco's new document production; call and email with T. Keller re Yesco's motion to seal exhibits to its opposition to motion for discovery sanctions.

Steven G. Gersten 4.50 hrs. \$ 945.00/hr.

09/27/23 Review and respond to David Picon's scheduling email (.3); analyze Proskauer's new dates against schedule (.2); prepare for status conference (.4); appear and attend status conference including conferrals (1.5); debrief with S. Gersten re: deposition prep (.5); discussion of filing exhibit D under seal (.2); additional email correspondence with D. Picon re: depositions (.2).

Amanda L. Cottrell 3.30 hrs. \$ 1045.00/hr.

09/27/23 Coordinated filing and service of exhibit to sanctions motion (.1); reviewed correspondence with Yesco counsel regarding outstanding discovery and pretrial scheduling issues (.3); reviewed and analyzed Yesco opposition to sanctions motion (.7)

Jeannie Kim 1.10 hrs. \$ 945.00/hr.

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09/27/23 Review and address conferral emails from Proskauer re proposed edits to proposed pretrial schedule; prepare for and attend status conference hearing; confer with Proskauer re pretrial schedule; email E. Stevens re document production issues; read and analyze Yesco's opposition to motion for discovery sanctions, motion to seal, and unsealed declarations in support of opposition; confer with SMRH team re strategy for reply brief iso motion for discovery sanctions.

Steven G. Gersten 4.20 hrs. \$ 945.00/hr.

09/28/23 Review and analyze Yesco's response to motion for evidence spoliation sanctions/

Amanda L. Cottrell 2.00 hrs. \$ 1045.00/hr.

09/28/23 Reviewed documents filed under seal (.2); coordinated filing and service of Ex. D to sanctions motion (.2); corresponded with A. De Camara and J. Wada regarding Yesco opposition (.1)

Jeannie Kim .50 hrs. \$ 945.00/hr.

09/28/23 Draft motion to seal document and supporting declaration in contemplation of filing Exhibit D to Motion for Discovery Sanctions under seal; email Proskauer re request for unredacted copies of sealed filings; review and analyze unredacted copies of sealed declarations and exhibits filed by Yesco in support of its opposition to motion for discovery sanctions; emails with Proskauer and Consilio re Yesco's sixth production received today.

Steven G. Gersten 4.20 hrs. \$ 945.00/hr.

09/29/23 Attention to sanctions motion in light of most recent discovery issues (1.6).

Ori Katz 1.60 hrs. \$ 1355.00/hr.

09/29/23 Attention to potential settlement of Yesco claims (.9).

Ori Katz .90 hrs. \$ 1355.00/hr.

10/01/23 Research authorities cited in Yesco's response to sanctions motion.

Amanda L. Cottrell 1.50 hrs. \$ 1045.00/hr.

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10/04/23	Analyze Proskauer's response brief.		
	Amanda L. Cottrell	1.50 hrs.	\$ 1045.00/hr.
10/04/23	Reviewed correspondence with B. Koo regarding Consilio fees (.1); corresponded with B. Koo regarding affiliate interests (.2); corresponded with J. Wada regarding same (.2)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
10/04/23	Confer with A. Cottrell and M. Benz re arguments for reply brief in support of motion for sanctions; review and analyze Yesco's new document production.		
	Steven G. Gersten	3.80 hrs.	\$ 945.00/hr.
10/04/23	Began preparing sanctions reply brief.		
	Matt Benz	.30 hrs.	\$ 650.00/hr.
10/05/23	Research and prepare response points and arguments in support of spoliation motion (3.9); analyze deposition testimony and evidence (2); correspondence to D. Picon re: trial date and pretrial deadlines (.2); correspondence to all counsel re: Yesco's data deletion (.2); correspondence to all counsel conferring on Proskauer Rose's efforts to be a fact witness (.2).		
	Amanda L. Cottrell	6.50 hrs.	\$ 1045.00/hr.
10/05/23	Review and analyze Yesco's new production; review emails from Proskauer re conferral on proposed schedule; prepared discovery; emails to B. Koo and L. Jang deposition availability in support of scheduling conferral.		
	Steven G. Gersten	4.40 hrs.	\$ 945.00/hr.
10/05/23	Reviewed first amended complaint, motion for discovery sanctions, and Yesco's opposition to same (.8); reviewed cases cited in support of Yesco's opposition and analyzed strategies to distinguish (1.6).		
	Matt Benz	2.40 hrs.	\$ 650.00/hr.

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10/06/23	Outline and discuss reply in support of sanctions motion with M. Benz and S. Gersten (1.5); draft and revise transmittal email to new production (.5); additional correspondence with D. Picon and team re: Proskauer's declaration (.5); draft reply brief (2).	Amanda L. Cottrell	4.50 hrs.	\$ 1045.00/hr.
10/06/23	Reviewed and analyzed Yesco status report re scheduling issues (.2); reviewed and revised plaintiffs' proposed second amended scheduling order (.2); coordinated filing and service of same (.2)	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
10/06/23	Reviewed Yesco's opposition to sanctions motion for purpose of preparing strategy for reply brief (1.4); researched Ninth Circuit case law in support of reply points (1.5); telephone conference with A. Cottrell and S. Gersten re drafting strategy for reply brief in support of sanctions motion (1.2); drafted reply brief inserts (4.6).	Matt Benz	8.70 hrs.	\$ 650.00/hr.
10/08/23	Drafted sanctions reply brief inserts.	Matt Benz	3.10 hrs.	\$ 650.00/hr.
10/09/23	Draft and revise reply brief iso spoliation of evidence and sanctions.	Amanda L. Cottrell	8.50 hrs.	\$ 1045.00/hr.
10/09/23	Reviewed and revised reply to Yesco opposition to sanctions motion (.2)	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/09/23	Draft responses to Yesco's factual assertions in opposition brief for inclusion in reply brief; confer with A. Cottrell re reply brief draft; review and analyze Yesco's new document production.	Steven G. Gersten	8.80 hrs.	\$ 945.00/hr.

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10/09/23 Telephone conference with A. Cottrell re status of sanctions reply brief drafting (.5); drafted revised sanctions reply brief inserts (4.7); reviewed and analyzed Yesco's opposition to sanctions motion in support of reply (.7); researched case law in support of reply (1.5).

Matt Benz 7.40 hrs. \$ 650.00/hr.

10/10/23 Revise and finalize reply brief iso discovery sanctions against Yesco.

Amanda L. Cottrell 3.30 hrs. \$ 1045.00/hr.

10/10/23 Reviewed revised draft reply regarding spoliation motion (.4); finalized same and supporting documents for filing and service (1.3); coordinated filing and service of same (.1); correspondence to Yesco counsel regarding proposed redacted documents (.1)

Jeannie Kim 1.90 hrs. \$ 945.00/hr.

10/10/23 Complete initial review of Yesco's new production; supplement, revise, and finalize reply in support of motion for discovery sanctions; conduct legal research in support of reply brief; draft declaration in support of reply brief; draft motion to file redacted document.

Steven G. Gersten 8.50 hrs. \$ 945.00/hr.

10/10/23 Research case law in support of reply.

Matt Benz 4.90 hrs. \$ 650.00/hr.

10/11/23 Reviewed and revised S. Gersten declaration in support of motion to file redacted documents (.2); reviewed and revised proposed order granting motion to file redacted documents (.2); coordinated filing and service of Gersten declaration and lodging of order (.3)

Jeannie Kim .70 hrs. \$ 945.00/hr.

10/11/23 Draft declaration in support of motion to file redacted document; review documents withheld as potentially privileged and prepare privilege log; review and analyze new document production from Yesco.

Steven G. Gersten 3.20 hrs. \$ 945.00/hr.

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10/12/23	Finalize and serve Plaintiffs' privilege log; review and analyze Defendant's privilege log; review and analyze new document production in preparation for deposition of Chairman Koo.		
	Steven G. Gersten	1.00 hrs.	\$ 945.00/hr.
10/13/23	Reviewed and responded to correspondence from A. Rosales regarding hearing on sanctions motion (.2); prepared for same (.1); reviewed entered order granting motion to redact reply to Yesco opposition to sanctions motion (.1); finalized S. Gersten declaration in support of same (.1); coordinated filing and service of same (.2); reviewed and analyzed Yesco status conference statement (.2)		
	Jeannie Kim	.90 hrs.	\$ 945.00/hr.
10/16/23	Prepare for and attend sanctions hearing.		
	Amanda L. Cottrell	6.00 hrs.	\$ 1045.00/hr.
10/16/23	Reviewed correspondence with A. Rosales regarding pretrial schedule (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/16/23	Corresponded with A. De Camara regarding third party satisfaction of e-discovery consultant invoices (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/16/23	Researched case law in connection with depositions of Yesco.		
	Matt Benz	.70 hrs.	\$ 650.00/hr.
10/17/23	Prepare for and attend hearing re motion for sanctions (3.0).		
	Ori Katz	3.00 hrs.	\$ 1355.00/hr.
10/17/23	Post hearing discussion with Ms. Cottrell re hearing take-aways (.5).		
	Ori Katz	.50 hrs.	\$ 1355.00/hr.
10/17/23	Prepare for and argue motion for sanctions.		
	Amanda L. Cottrell	6.00 hrs.	\$ 1045.00/hr.



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10/17/23	Reviewed and analyzed Yesco settlement proposal (.2); corresponded with A. De Camara regarding same and sanctions hearing results (.2)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
10/17/23	Continue revising cross examination outline in preparation for Chairman Koo's deposition; attend hearing on motion for sanctions.		
	Steven G. Gersten	9.50 hrs.	\$ 945.00/hr.
10/17/23	Researched case law in connection depositions of Yesco.		
	Matt Benz	1.30 hrs.	\$ 650.00/hr.
10/18/23	Work on settlement proposal for Yesco adversary proceeding (2.3).		
	Ori Katz	2.30 hrs.	\$ 1355.00/hr.
10/18/23	Conference with M. Benz re legal research for deposition prep and related summary judgment briefing issues (.4).		
	Amanda L. Cottrell	.40 hrs.	\$ 1045.00/hr.
10/18/23	Conference with B. Koo to discuss outline and issues to cross-examine Chairman Koo (.7); draft cross-examination insert re: Chairman Koo focusing on verbal conversations (2).		
	Amanda L. Cottrell	2.70 hrs.	\$ 1045.00/hr.
10/18/23	Corresponded with A. De Camara and J. Wada regarding Yesco settlement proposal (.2); revised same (.1); reviewed correspondence to Yesco counsel regarding same (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
10/18/23	Telephone conference with B. Koo and A. Cottrell re preparation for Chairman Koo's deposition; continue revising cross examination outline in preparation for Chairman Koo's deposition.		
	Steven G. Gersten	7.80 hrs.	\$ 945.00/hr.

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10/18/23	Researched case law in connection with depositions of Yesco (1.4); drafted motion for summary judgment (.4).		
	Matt Benz	1.80 hrs.	\$ 650.00/hr.
10/19/23	Continue working on a Yesco global settlement (2.7).		
	Ori Katz	2.70 hrs.	\$ 1355.00/hr.
10/19/23	Draft and revise cross-examination of Yesco's 30(b)(6) witness Chairman Koo.		
	Amanda L. Cottrell	4.00 hrs.	\$ 1045.00/hr.
10/19/23	Corresponded with T. Karcher regarding Formation counter to Yesco settlement (.1); corresponded with A. De Camara regarding Yesco settlement terms (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/19/23	Continue revising cross examination outline in preparation for Chairman Koo's deposition.		
	Steven G. Gersten	8.40 hrs.	\$ 945.00/hr.
10/20/23	Settlement discussions with Yesco in connection with global resolution (1.7).		
	Ori Katz	1.70 hrs.	\$ 1355.00/hr.
10/20/23	Draft and revise cross-examination of Yesco.		
	Amanda L. Cottrell	4.50 hrs.	\$ 1045.00/hr.
10/20/23	Corresponded with A. De Camara and B. Koo regarding Yesco counteroffer (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/20/23	Continue drafting cross examination outline for upcoming deposition of Yesco corporate representatives; read and analyze Yesco's objections to 30(b)(6) deposition notice and revised designations of its corporate representatives for noticed topics; confer with O. Katz and A. Cottrell re Yesco's settlement offer.		
	Steven G. Gersten	4.40 hrs.	\$ 945.00/hr.

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10/21/23	Research and analyze case law in connection with Yesco's deposition.		
	Amanda L. Cottrell	3.00 hrs.	\$ 1045.00/hr.
10/22/23	Draft and revise cross-examination of Yesco's corporate rep.		
	Amanda L. Cottrell	5.00 hrs.	\$ 1045.00/hr.
10/22/23	Corresponded with A. Rosales (USBC) regarding potential resolution of adversary proceeding (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/22/23	Researched case law in connection with depositions of Yesco (2.9); drafted summary memorandum re same (1.4).		
	Matt Benz	4.30 hrs.	\$ 650.00/hr.
10/23/23	Follow up with Yesco re settlement deal points (.9).		
	Ori Katz	.90 hrs.	\$ 1355.00/hr.
10/23/23	Corresponded with A. De Camara regarding settlement negotiations with Yesco (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/25/23	Attention to deal points re settlement with Yesco (1.3).		
	Ori Katz	1.30 hrs.	\$ 1355.00/hr.
10/25/23	Reviewed and analyzed claims filed (.2); corresponded with J. Wada and A. De Camara regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/27/23	Attention to settlement documents (1.7).		
	Ori Katz	1.70 hrs.	\$ 1355.00/hr.

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10/27/23	Reviewed correspondence with A. Rosales regarding status of settlement documentation with Yesco (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/30/23	Follow up re Yesco settlement status and terms (.7).		
	Ori Katz	.70 hrs.	\$ 1355.00/hr.
11/02/23	Reviewed and analyzed draft settlement agreement (.2); began drafting motion to compromise controversy with Yesco (1.9).		
	Jeannie Kim	2.10 hrs.	\$ 945.00/hr.
11/03/23	Reviewed and revised draft settlement agreement (.2); continued drafting motion to compromise controversy with Yesco (4.0).		
	Jeannie Kim	4.20 hrs.	\$ 945.00/hr.
11/04/23	Reviewed and revised motion to motion to compromise controversy with Yesco (.7).		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
11/07/23	Reviewed strategy regarding treatment of hosted discovery (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/13/23	Attention to settlement with Yesco (.7).		
	Ori Katz	.70 hrs.	\$ 1355.00/hr.
11/13/23	Reviewed draft revisions to settlement agreement (.1); reviewed comments from L. Jang regarding same (.1); corresponded with A. De Camara regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
11/16/23	Attention to logistics re potential Yesco settlement (1.8).		
	Ori Katz	1.80 hrs.	\$ 1355.00/hr.

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11/20/23	Prepared stipulation to dismiss adversary proceeding (.4); corresponded with A. De Camara and J. Wada regarding settlement status (.2).		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
11/22/23	Continued discussions with Yesco re components of settlement (.4).		
	Ori Katz	.40 hrs.	\$ 1355.00/hr.
11/27/23	Continue working on package of settlement documents (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
11/28/23	Meet and confer with Mr. Karcher re settlement (.2).		
	Ori Katz	.20 hrs.	\$ 1355.00/hr.
11/28/23	Attention to open settlement issues involving Yesco (1.0).		
	Ori Katz	1.00 hrs.	\$ 1355.00/hr.
11/29/23	Continue working on package of settlement and dismissal documents (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
11/29/23	Developed strategy to complete documentation of Yesco settlement (.3); telephone conference with T. Karcher regarding Yesco settlement terms (.5); corresponded with T. Karcher and D. Picon regarding diligence inquiries related to Yesco settlement (.9).		
	Jeannie Kim	1.70 hrs.	\$ 945.00/hr.
11/30/23	Coordinate with Yesco re open issues under proposed settlement (1.8).		
	Ori Katz	1.80 hrs.	\$ 1355.00/hr.
12/06/23	Review of changes to settlement package made by Yesco (1.3).		
	Ori Katz	1.30 hrs.	\$ 1355.00/hr.

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12/06/23 Reviewed and revised settlement agreement (.2); reviewed and revised motion to compromise controversy with Yesco (.5); corresponded with Proskauer team regarding comments on settlement documents (.1).

Jeannie Kim .80 hrs. \$ 945.00/hr.

12/07/23 Follow up re diligence requests of Yesco in connection with settlement (1.4).

Ori Katz 1.40 hrs. \$ 1355.00/hr.

12/08/23 Drafted omnibus declaration of A. De Camara in support of motion to compromise controversy with Yesco, sell fund assets and dismiss cases.

Jeannie Kim 1.30 hrs. \$ 945.00/hr.

12/09/23 Corresponded with T. Karcher regarding Yesco comments on settlement agreement and related draft briefing (.2).

Jeannie Kim .20 hrs. \$ 945.00/hr.

12/10/23 Reviewed draft order regarding motion to compromise controversy with Yesco (.1); reviewed Yesco comments on settlement agreement (.2); motion to compromise controversy with same (.2); correspondence to Proskauer team regarding settlement documents and pleadings (.2).

Jeannie Kim .70 hrs. \$ 945.00/hr.

12/11/23 Follow up re settlement package revisions and missing items related to sale and dismissal (1.9).

Ori Katz 1.90 hrs. \$ 1355.00/hr.

12/11/23 Reviewed status of discussions with Yesco regarding documentation of settlement agreement and related pleadings.

Jeannie Kim .10 hrs. \$ 945.00/hr.

12/13/23 Work with Yesco's counsel re revisions and clarifications to settlement terms and components (2.0).

Ori Katz 2.00 hrs. \$ 1355.00/hr.

12/13/23	Reviewed and analyzed Yesco comments on settlement documents.		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
12/14/23	Corresponded with L. Jang regarding settlement documents and fund assets (.2); reviewed and revised settlement agreement (.7); reviewed and revised motion to compromise controversy with Yesco (1.2); prepared settlement closing checklist (.6); reviewed form of Yesco stipulation to dismiss arbitration (.1); corresponded with B. Koo, L. Jang and A. De Camara regarding request for review and comment on draft settlement documents (.1); corresponded with Proskauer team regarding status of settlement documents (.2).		
	Jeannie Kim	3.10 hrs.	\$ 945.00/hr.
12/15/23	Reviewed and revised settlement agreement (.2); reviewed and revised motion to approve settlement agreement (.2); drafted omnibus notice regarding hearing on sale, motion to compromise controversy, and motion to dismiss (.6); reviewed and revised De Camara declaration (1.0); reviewed certificate of cancellation of domestic fund (.1); reviewed and revised settlement checklist (.2); corresponded with B. Koo and L. Jang (.2) and A. De Camara (.2) requesting review and comment on settlement documents; corresponded with Proskauer team (multiple) regarding Yesco comment on settlement documents (.4).		
	Jeannie Kim	3.10 hrs.	\$ 945.00/hr.
12/15/23	Reviewed the court calendar re available hearing dates.		
	Koray Erbas	.20 hrs.	\$ 700.00/hr.
12/16/23	Revised schedule to settlement agreement (.4); corresponded with B. Koo, L. Jang, and A. De Camara regarding settlement documents (.3); corresponded with T. Karcher regarding Yesco comments on settlement documents (.4).		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.

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12/17/23	Reviewed and revised settlement agreement (.7); draft omnibus notice of hearing on settlement motions (.2); revised De Camara declaration in support of same (.1); corresponded with clients regarding draft settlement documents (.2); corresponded with T. Karcher regarding same (.2); reviewed outstanding administrative claims (.3); corresponded with A. De Camara regarding comments on declaration of same in support of settlement documents (.2).		
	Jeannie Kim	1.90 hrs.	\$ 945.00/hr.
12/18/23	Work on settlement open issues re Yesco (3.2).		
	Ori Katz	3.20 hrs.	\$ 1355.00/hr.
12/18/23	Reviewed and revised settlement agreement (.8); reviewed and revised De Camara declaration (.6); corresponded with clients regarding revised settlement documents (.5).		
	Jeannie Kim	1.90 hrs.	\$ 945.00/hr.
12/19/23	Follow up with counsel for Mr. Koo on open issues related to settlement (1.7).		
	Ori Katz	1.70 hrs.	\$ 1355.00/hr.
12/19/23	Corresponded (.1) and conferred (.4) with B. Koo and B. Danitz regarding Yesco settlement terms; reviewed correspondence with Proskauer team regarding comments on settlement agreement (.3).		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
12/19/23	Reviewed and revised settlement agreement (.3); reviewed and revised motion to compromise Yesco controversy and approve same (.4); reviewed and revised De Camara declaration in support of same, motion to dismiss, and sale motion (.4); corresponded with B. Danitz and B. Koo regarding settlement agreement comments (.3); telephone conference with B. Danitz and B. Koo regarding same (.4); corresponded with Proskauer team regarding status of revised documents (.1); corresponded with A. De Camara and J. Wada regarding same (.2).		
	Jeannie Kim	2.10 hrs.	\$ 945.00/hr.
12/20/23	Developed strategy regarding global settlement with Yesco (.3).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.



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12/21/23	Continue working on final open points in settlement to address issues raised by Mr. Koo and Yesco (2.4).		
	Ori Katz	2.40 hrs.	\$ 1355.00/hr.
12/21/23	Reviewed and revised settlement agreement (.3); corresponded with B. Danitz and B. Koo regarding same (.3).		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
12/22/23	Continue working to resolve open issues between Mr. Koo and Yesco in connection with overall settlement of adversary proceeding (2.0).		
	Ori Katz	2.00 hrs.	\$ 1355.00/hr.
12/22/23	Corresponded with B. Koo and B. Danitz regarding further comments on settlement agreement (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/23/23	Corresponded with B. Koo regarding further comments on settlement agreement (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/24/23	Corresponded with B. Danitz regarding further comments on settlement agreement (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/26/23	Continue revising settlement package (1.8).		
	Ori Katz	1.80 hrs.	\$ 1355.00/hr.
12/26/23	Reviewed and revised settlement agreement (.3); corresponded with B. Koo and B. Danitz regarding same (.2).		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
12/27/23	Continue working on settlement final deal terms (1.2).		
	Ori Katz	1.20 hrs.	\$ 1355.00/hr.

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01/03/24 Revisions to package of settlement papers and agreements based on comments and input from Yesco (1.0).

Ori Katz 1.00 hrs. \$ 1465.00/hr.

01/03/24 Corresponded with T. Karcher regarding further comments on settlement agreement (.1); reviewed and analyzed same (.1).

Jeannie Kim .20 hrs. \$ 1005.00/hr.

01/04/24 Reviewed and analyzed proposed comments from Proskauer team regarding settlement documents and related briefing (.3).

Jeannie Kim .30 hrs. \$ 1005.00/hr.

01/05/24 Follow up with personal counsel to Mr. Koo re global settlement (.9).

Ori Katz .90 hrs. \$ 1465.00/hr.

01/05/24 Corresponded with A. De Camara regarding comments on further revised settlement documents (.2).

Jeannie Kim .20 hrs. \$ 1005.00/hr.

01/07/24 Reviewed correspondence with B. Koo regarding comments on revised settlement documents (.1).

Jeannie Kim .10 hrs. \$ 1005.00/hr.

01/08/24 Corresponded with A. De Camara regarding comments on further revised settlement documents.

Jeannie Kim .20 hrs. \$ 1005.00/hr.

01/09/24 Follow up with Mr. Koo re settlement (.2).

Ori Katz .20 hrs. \$ 1465.00/hr.

01/10/24 Continue working to finalize settlement papers (.6).

Ori Katz .60 hrs. \$ 1465.00/hr.

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01/11/24	Continue working on parameters of settlement with Yesco (3.2).		
	Ori Katz	3.20 hrs.	\$ 1465.00/hr.
01/11/24	Corresponded with B. Danitz regarding further comments on settlement agreement (.3); corresponded with A. De Camara regarding same (.1); reviewed and revised settlement agreement (.3); corresponded with D. Picon regarding Yesco comments on revised settlement agreement (.1).		
	Jeannie Kim	.80 hrs.	\$ 1005.00/hr.
01/12/24	Coordinate with Mr. Koo's counsel re his sign-off on settlement package (1.5).		
	Ori Katz	1.50 hrs.	\$ 1465.00/hr.
01/12/24	Coordinate with Yesco's counsel re settlement final terms and filing of same (1.7).		
	Ori Katz	1.70 hrs.	\$ 1465.00/hr.
01/12/24	Follow up with Mr. De Camara re settlement (.6).		
	Ori Katz	.60 hrs.	\$ 1465.00/hr.
01/12/24	Reviewed correspondence with B. Danitz and B. Koo regarding comments on settlement agreement (.2); reviewed and revised settlement agreement (.2); follow-up correspondence with B. Danitz and B. Koo regarding same (.2); corresponded with Proskauer team regarding further revised form of settlement agreement (.2); corresponded with A. De Camara regarding settlement strategy (.2).		
	Jeannie Kim	1.00 hrs.	\$ 1005.00/hr.
01/13/24	Further reviewed and revised settlement agreement to incorporate Morgan Lewis comments regarding dissolution (.5); corresponded with B. Koo counsel regarding same (.1).		
	Jeannie Kim	.60 hrs.	\$ 1005.00/hr.
01/15/24	Further reviewed and revised settlement agreement (.2); corresponded with L. Jang and J. Park regarding same (.1).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.

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01/16/24	Continued settlement negotiations with Yesco.		
	Ori Katz	1.00 hrs.	\$ 1465.00/hr.
01/16/24	Follow up settlement analysis with Mr. De Camara.		
	Ori Katz	.40 hrs.	\$ 1465.00/hr.
01/16/24	Work on revisions to overall settlement package.		
	Ori Katz	1.20 hrs.	\$ 1465.00/hr.
01/16/24	Telephone conference with A. De Camara and J. Wada regarding outstanding settlement issues.		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
01/16/24	Corresponded with A. De Camara and J. Wada regarding outstanding settlement issues (.2).		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
01/17/24	Follow up with counsel for Brian Koo re settlement terms related to winding up of funds.		
	Ori Katz	.50 hrs.	\$ 1465.00/hr.
01/17/24	Follow up with Yesco re open issues remaining under proposed settlement agreement.		
	Ori Katz	.80 hrs.	\$ 1465.00/hr.
01/17/24	Reviewed and analyzed proposed further revisions to settlement agreement (.2).		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
01/18/24	Corresponded with T. Karcher regarding status of Yesco comments on draft settlement agreement (.1); corresponded with D. Picon regarding same (.1).		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.

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01/18/24	Reviewed and analyzed Yesco's further comments on settlement documents.
	Jeannie Kim .30 hrs. \$ 1005.00/hr.
01/19/24	Attention to additional revisions to settlement package from Yesco.
	Ori Katz 1.80 hrs. \$ 1465.00/hr.
01/22/24	Review and revision of settlement and dismissal filing package.
	Ori Katz 2.00 hrs. \$ 1465.00/hr.
01/22/24	Reviewed correspondence with B. Koo regarding final comments on settlement agreement (.2); reviewed and revised same (.2); corresponded with B. Danitz and B. Koo regarding revised settlement agreement (.1).
	Jeannie Kim .50 hrs. \$ 1005.00/hr.
01/23/24	Follow up with Yesco re filing logistics in connection with settlement and dismissal of cases.
	Ori Katz 1.00 hrs. \$ 1465.00/hr.
01/23/24	Corresponded with A. De Camara regarding further revised briefing regarding settlement agreement (.4); telephone conference with A. De Camara regarding same (.4); developed strategy regarding court approval of same (.3); telephone conference with J. Wada regarding marketing strategy (.1).
	Jeannie Kim 1.20 hrs. \$ 1005.00/hr.
01/24/24	Review of additional changes requested by Yesco.
	Ori Katz .40 hrs. \$ 1465.00/hr.
01/24/24	Follow up with Mr. Koo re his input on revisions to settlement.
	Ori Katz .60 hrs. \$ 1465.00/hr.
01/24/24	Conferred and corresponded with A. De Camara regarding declaration of same in support of settlement documents (.2); reviewed and revised same (.2); corresponded with Proskauer team regarding comments on same (.3).
	Jeannie Kim .70 hrs. \$ 1005.00/hr.

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01/25/24	Finalize for filing the entire settlement package and dismissal papers agreed to with Yesco as part of global settlement.		
	Ori Katz	2.60 hrs.	\$ 1465.00/hr.
01/25/24	Reviewed and revised De Camara declaration (.7), motion to compromise controversy (.8), notice of fund assets sale (.6), sale motion (.6), notice of hearing (.3), and motion to dismiss (1.3) in support of settlement documents (.6); corresponded with Proskauer team regarding same (.7); conferred and corresponded with L. Jang and B. Koo regarding portfolio company contact information (.3); telephone conference with D. Picon regarding Yesco final comments regarding settlement documents (.1) and authorization to file settlement documents; coordinated filing and service of same (1.6).		
	Jeannie Kim	7.60 hrs.	\$ 1005.00/hr.
01/26/24	Served notice of sale of fund assets in furtherance of settlement (.8); coordinated filing and service of notice of hearing regarding sale and settlement (.2); coordinated mail service of settlement documents (.2); prepared final executed settlement agreement (.2); corresponded with T. Karcher regarding same (.2).		
	Jeannie Kim	1.60 hrs.	\$ 1005.00/hr.
02/08/24	Prepare for hearing on motions to settle, sell and dismiss (3.0).		
	Ori Katz	3.00 hrs.	\$ 1465.00/hr.
02/09/24	Coordinate with Yesco for upcoming hearing (.5).		
	Ori Katz	.50 hrs.	\$ 1465.00/hr.
02/12/24	Prepared O. Katz for settlement and sale hearing (.2); corresponded with A. De Camara and B. Koo regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
02/14/24	Prepare for hearing on various motions (4.4).		
	Ori Katz	4.40 hrs.	\$ 1465.00/hr.

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02/15/24	Prepare for court hearing on motions to settle, sell and dismiss cases (2.0).		
	Ori Katz	2.00 hrs.	\$ 1465.00/hr.
02/15/24	Attend hearing on motions to settle, sell and dismiss cases (1.0).		
	Ori Katz	1.00 hrs.	\$ 1465.00/hr.
02/15/24	Reviewed and revised order regarding motion to compromise Yesco controversy (.2)		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
02/15/24	Prepared for hearing regarding settlement, sale and structured dismissal (2.6)		
	Jeannie Kim	2.60 hrs.	\$ 1005.00/hr.
02/16/24	Corresponded with Proskauer team regarding form of order regarding motion to compromise controversy (.2); coordinated lodging of same (.2)		
	Jeannie Kim	.40 hrs.	\$ 1005.00/hr.
02/18/24	Corresponded with D. Picon regarding Yesco wire instructions for settlement payment (.1)		
	Jeannie Kim	.10 hrs.	\$ 1005.00/hr.
02/20/24	Reviewed and revised settlement checklist (.8); reviewed and revised order granting motion to dismiss chapter 11 cases (.1); corresponded with Proskauer team regarding settlement payments (.2); corresponded with A. De Camara regarding same (.2)		
	Jeannie Kim	1.30 hrs.	\$ 1005.00/hr.
02/20/24	Exchanged emails with Sheppard Mullin team re Settlement Agreement (.2); Conferred with O. Katz re Settlement Agreement (.1)		
	Eduardo G. Linares	.40 hrs.	\$ 695.00/hr.
02/20/24	Analyzed Settlement Agreement.		
	Eduardo G. Linares	.70 hrs.	\$ 695.00/hr.

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02/20/24	Prepared closing checklist for the settlement.		
	Eduardo G. Linares	2.30 hrs.	\$ 695.00/hr.
02/20/24	Revised closing checklist for the settlement.		
	Eduardo G. Linares	.40 hrs.	\$ 695.00/hr.
02/21/24	Corresponded with B. Koo regarding review and execution of certificate of cancellation of domestic fund (.1); coordinated filing and service of stipulation to dismiss adversary proceeding (.1)		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
02/23/24	Reviewed correspondence from Cayman limited partners in response to court-filed settlement documents (.1); corresponded with A. De Camara regarding same (.2)		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.



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*Timekeeper Summary of: Other Contested Matters (excluding assumption/rejection motions)*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
<i>Ori Katz</i>	<i>152.70</i>	<i>\$ 1,346.41</i>	<i>\$ 205,597.50</i>
<i>Michael Lauter</i>	<i>1.10</i>	<i>\$ 995.00</i>	<i>\$ 1,094.50</i>
<i>Johneth C. Park</i>	<i>1.40</i>	<i>\$ 1,175.00</i>	<i>\$ 1,645.00</i>
<i>Gianna E. Segretti</i>	<i>1.70</i>	<i>\$ 770.00</i>	<i>\$ 1,309.00</i>
<i>Amanda L. Cottrell</i>	<i>221.80</i>	<i>\$ 1,027.17</i>	<i>\$ 227,826.00</i>
<i>Koray Erbas</i>	<i>4.90</i>	<i>\$ 656.84</i>	<i>\$ 3,218.50</i>
<i>Jeannie Kim</i>	<i>154.80</i>	<i>\$ 934.72</i>	<i>\$ 144,695.00</i>
<i>Steven G. Gersten</i>	<i>419.80</i>	<i>\$ 943.22</i>	<i>\$ 395,963.50</i>
<i>Scott Natsuhara</i>	<i>2.10</i>	<i>\$ 650.00</i>	<i>\$ 1,365.00</i>
<i>Matt Benz</i>	<i>34.90</i>	<i>\$ 650.00</i>	<i>\$ 22,685.00</i>
<i>Eduardo G. Linares</i>	<i>3.80</i>	<i>\$ 695.00</i>	<i>\$ 2,641.00</i>
<i>Lauryn Vigil</i>	<i>12.40</i>	<i>\$ 210.00</i>	<i>\$ 2,604.00</i>
<i>Totals</i>	<i>1011.40</i>	<i>\$ 999.25</i>	<i>\$ 1,010,644.00</i>

**Non-Working Travel**

10/10/22	Travel from Dallas, Texas to San Jose, California to appear in person and argue in opposition to Yesco's motion to dismiss (4.5).
	Amanda L. Cottrell 4.50 hrs. \$ 975.00/hr.
10/11/22	Travel from San Jose, CA to Dallas, TX (4.5).
	Amanda L. Cottrell 4.50 hrs. \$ 975.00/hr.
08/21/23	Travel to San Francisco for deposition prep and to defend depositions.
	Steven G. Gersten 4.00 hrs. \$ 945.00/hr.
08/23/23	Tavel back to Dallas, Texas (4.0).
	Amanda L. Cottrell 4.00 hrs. \$ 1045.00/hr.

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08/24/23 Travel back to Dallas.

Steven G. Gersten 4.00 hrs. \$ 945.00/hr.

08/28/23 Travel from Dallas to San Francisco for deposition prep meeting tomorrow and to defend August 30 deposition of B. Koo.

Steven G. Gersten 4.00 hrs. \$ 945.00/hr.

*Timekeeper Summary of: Non-Working Travel*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Amanda L. Cottrell	13.00	\$ 996.54	\$ 12,955.00
Steven G. Gersten	12.00	\$ 945.00	\$ 11,340.00
Totals	25.00	\$ 971.80	\$ 24,295.00

**Case Administration - General**

11/16/23 Corresponded with H. Khanbai regarding dissolution of Cayman fund (.1).

Jeannie Kim .10 hrs. \$ 945.00/hr.

11/17/23 Continue working on open items in connection with contemplated structured dismissal, including issues arising in connection with Cayman fund (1.7).

Ori Katz 1.70 hrs. \$ 1355.00/hr.

11/27/23 Corresponded with M. Richie regarding wind down of Cayman fund (.1); corresponded with J. Wada and L. Jang regarding same (.2).

Jeannie Kim .30 hrs. \$ 945.00/hr.

12/06/23 Reviewed draft motion to dismiss.

Jeannie Kim .10 hrs. \$ 945.00/hr.

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12/08/23	Revisions to package of settlement, sale and dismissal documents (1.9).		
	Ori Katz	1.90 hrs.	\$ 1355.00/hr.
12/08/23	Corresponded with L. Jang and J. Wada regarding K-1 reserve in connection with Yesco settlement agreement (.4); reviewed draft motion to dismiss (.4).		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
12/10/23	Reviewed and revised draft motion to dismiss.		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.
12/11/23	Corresponded with J. Wada regarding funds dissolution timeline (.1); corresponded with B. Koo and L. Jang regarding same (.1).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/14/23	Reviewed and revised motion to dismiss .		
	Jeannie Kim	1.10 hrs.	\$ 945.00/hr.
12/15/23	Reviewed and revised motion to dismiss (.3).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
12/16/23	Reviewed and revised motion to dismiss (.4); reviewed and revised De Camara declaration (.3); reviewed and revised motion to dismiss (.1).		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
12/20/23	Reviewed and revised motion to dismiss (.2).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/20/23	Conferred with O. Katz re scope of Camara employment.		
	Koray Erbası	.20 hrs.	\$ 700.00/hr.
02/01/24	Corresponded with J. Wada regarding Consilio delinquency in connection with preparation of monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 1005.00/hr.

02/08/24 Reviewed and analyzed U.S. Trustee's objection to structured dismissal motion (.2)

Jeannie Kim .20 hrs. \$ 1005.00/hr.

02/12/24 Reviewed draft monthly operating reports (.2)

Jeannie Kim .20 hrs. \$ 1005.00/hr.

02/15/24 Corresponded with Greenberg Traurig team regarding procedural steps related to entry of dismissal and sale orders (.1); conferred and corresponded with J. Wada regarding performance under dismissal and settlement orders (.1); corresponded with Proskauer team regarding payment instructions for settlement funds (.1); prepared for hearing regarding sale, motion to compromise controversy, and dismissal (.5); appeared at hearing on same (1.5); reviewed and revised dismissal order (.2); corresponded with GT team regarding dismissal order (.1); corresponded with Proskauer and Greenberg Traurig teams regarding initial GT comments on dismissal order (.2); further reviewed and revised proposed form of dismissal order (.2); corresponded with Proskauer and GT teams regarding same (.1); regarding corresponded with A. De Camara regarding proposed final form of dismissal order (.1); corresponded with J. Blumberg regarding same (.3); reviewed and revised dismissal order based on comments from same (.1); corresponded with GT team regarding U.S. Trustee comment on dismissal order (.1)

Jeannie Kim 3.70 hrs. \$ 1005.00/hr.

02/16/24 Finalized stipulation to dismiss adversary proceeding (.1); coordinated filing and service of same (.1); revised form of certificate of cancellation of domestic fund (.1); corresponded with B. Koo regarding same and update regarding results of hearings (.4); corresponded with J. Blumberg and Proskauer regarding dismissal order (.1); corresponded with GT team regarding same (.1); coordinated lodging of same (.2); reviewed December monthly operating reports (.1); coordinated filing and service of same (.3); reviewed entered dismissal order (.1); corresponded with A. De Camara regarding same (.1); conferred and corresponded with U.S. Bankruptcy Court regarding closing of case (.2)

Jeannie Kim 1.90 hrs. \$ 1005.00/hr.

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Page 131 of 17002/19/24      Corresponded with B. Koo regarding sale/dismissal/settlement hearing results  
(.1)

Jeannie Kim      .10 hrs.      \$ 1005.00/hr.

*Timekeeper Summary of: Case Administration - General*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	3.60	\$ 1,355.00	\$ 4,878.00
Koray Erbası	0.20	\$ 700.00	\$ 140.00
Jeannie Kim	11.20	\$ 978.21	\$ 10,956.00
<i>Totals</i>	15.00	\$ 1,064.93	\$ 15,974.00

**Business Operations**06/27/22      Attended to stock option query. Reviewed related materials. Internal  
conferences re same.

Jason R. Schendel      .40 hrs.      \$ 1095.00/hr.

09/23/22      Corresponded with L. Jang regarding contract with Cayman registered agent  
(.2); reviewed same contract (.1); corresponded with A. De Camara regarding  
same (.1)

Jeannie Kim      .40 hrs.      \$ 880.00/hr.

03/25/23      Reviewed correspondence between A. De Camara and L. Jang regarding non-  
debtor affiliate securities registration (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

03/27/23      Corresponded with J. Wada and L. Jang regarding IARD disclosures (.1).

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

### *Timekeeper Summary of: Business Operations*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Jason R. Schendel	0.40	\$ 1,095.00	\$ 438.00
Jeannie Kim	1.20	\$ 923.33	\$ 1,108.00
Totals	1.60	\$ 966.25	\$ 1,546.00

04/19/22	Telephone conference with A. De Camara, J. Wada, and L. Jang regarding preparation of schedules and responses to U.S. Trustee IDI.		
	Jeannie Kim	1.40 hrs.	\$ 880.00/hr.

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04/28/22	Reviewed correspondence from L. Jang and A. De Camara regarding opening of new debtor in possession accounts at East West Bank.
Jeannie Kim	.10 hrs.      \$ 880.00/hr.
04/29/22	Reviewed correspondence between A. De Camara and L. Jang regarding opening of new DIP accounts at East West Bank (.2); reviewed proposed final order granting motion to retain and appoint chief restructuring officer (.2).
Jeannie Kim	.40 hrs.      \$ 880.00/hr.
05/01/22	Reviewed executed East West DIP bank account cards (.1); corresponded with N. Rivera regarding same (.1); corresponded with A. De Camara regarding same (.1).
Jeannie Kim	.30 hrs.      \$ 880.00/hr.
05/02/22	Review of materials submitted in connection with IDI in preparation for same.
Ori Katz	1.00 hrs.      \$ 1255.00/hr.
05/02/22	Corresponded with L. Jang and J. Wada regarding preparation of April monthly operating reports.
Jeannie Kim	.20 hrs.      \$ 880.00/hr.
05/09/22	Corresponded with J. Wada and L. Jang regarding preparation of April monthly operating reports (.1).
Jeannie Kim	.10 hrs.      \$ 880.00/hr.
05/11/22	Corresponded with A. De Camara and J. Wada regarding follow-up responses to U.S. Trustee in connection with initial debtor interview (.2); corresponded with N. Rivera regarding same (.1); reviewed correspondence from L. Jang regarding payments to professionals in connection with preparation of April monthly operating reports (.1); reviewed correspondence from H. Khanbai regarding same (.1).
Jeannie Kim	.50 hrs.      \$ 880.00/hr.

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05/12/22      Corresponded with L. Jang and J. Wada regarding preparation of April monthly operating reports (.2); reviewed Sheppard Mullin prepetition invoices in connection with same (.2); corresponded with J. Blumberg and N. Rivera regarding same (.2).

Jeannie Kim      .60 hrs.      \$ 880.00/hr.

05/16/22      Reviewed correspondence between J. Wada and L. Jang regarding preparation of April monthly operating report (.1).

Jeannie Kim      .10 hrs.      \$ 880.00/hr.

05/18/22      Corresponded with L. Jang and J. Wada regarding preparation of April monthly operating reports (.1); reviewed draft April monthly operating reports (.2).

Jeannie Kim      .30 hrs.      \$ 880.00/hr.

05/19/22      Corresponded with L. Jang, J. Wada, and B. Koo regarding preparation of April monthly operating reports.

Jeannie Kim      .20 hrs.      \$ 880.00/hr.

05/22/22      Reviewed draft April monthly operating reports for each debtor (.6); revised draft footnotes in support of same (1.1); corresponded with J. Wada, L. Jang, and A. De Camara regarding same (.2).

Jeannie Kim      1.90 hrs.      \$ 880.00/hr.

05/23/22      Telephone conference with A. De Camara, J. Wada, L. Jang regarding revisions to April monthly operating report (.3); conferred and corresponded with J. Wada regarding same (.4); telephone conference with J. Wada, L. Jang, and A. De Camara regarding same (.8); corresponded with A. De Camara regarding revisions to same (.3); finalized same for service and filing with U.S. Bankruptcy Court (.3); filed and served same (.4).

Jeannie Kim      2.50 hrs.      \$ 880.00/hr.

05/24/22      Final review of schedules/SOFA prior to filing.

Ori Katz      .50 hrs.      \$ 1255.00/hr.



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06/20/22	Reviewed and revised draft footnotes to monthly operating reports (.4); reviewed draft final monthly operating report (.1); reviewed correspondence from A. De Camara regarding same (.1).	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
06/21/22	Corresponded with A. De Camara, J. Wada, and L. Jang regarding case strategy (.2); reviewed revised monthly operating reports (.4); corresponded with J. Wada, A. De Camara, and L. Jang regarding same (.2); developed strategy regarding revisions to SOAL and SOFA (.1); coordinated filing and service of monthly operating reports (.2).	Jeannie Kim	1.10 hrs.	\$ 880.00/hr.
07/18/22	Reviewed correspondence to Campbells regarding June MOR data (.1).	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/19/22	Reviewed correspondence with Campbells regarding outstanding postpetition fees accrued in connection with preparation of June monthly operating reports.	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/20/22	Corresponded with J. Wada regarding outstanding quarterly fees (.1); corresponded with J. Blumberg and E. Rofael regarding same (.1); reviewed draft June monthly operating reports (.1).	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
07/21/22	Revised draft June monthly operating report in connection with Sheppard Mullin fees (.1); corresponded with Office of the U.S. Trustee regarding quarterly fee inquiry (.2).	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
07/22/22	Reviewed correspondence with L. Jang regarding quarterly U.S. Trustee fees (.1).	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
07/24/22	Corresponded with L. Jang regarding June monthly operating report.	Jeannie Kim	.20 hrs.	\$ 880.00/hr.

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07/25/22	Reviewed draft monthly operating reports (.1); corresponded with J. Wada regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
07/26/22	Reviewed June monthly operating reports (.1); coordinated filing and service of same (.1); corresponded with A. De Camara, J. Wada (Sherwood) and L. Jang regarding conformed copies of same (.1).		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
08/16/22	Reviewed correspondence with L. Naidu regarding Cayman counsel fees in connection with preparation of July monthly operating reports (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
08/17/22	Corresponded with J. Wada regarding preparation of July monthly operating report (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
08/24/22	Corresponded with E. Rofael regarding July monthly operating reports (.1); corresponded with J. Wada regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
08/25/22	Corresponded with L. Jang and J. Wada regarding preparation of July monthly operating reports.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
08/26/22	Reviewed and analyzed July monthly operating reports (.2); corresponded with J. Wada and A. De Camara regarding same (.1); finalized and filed same with court (.4)		
	Jeannie Kim	.70 hrs.	\$ 880.00/hr.
08/29/22	Reviewed certificates of service regarding July monthly operating reports and coordinated filing of same.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.

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09/01/22	Corresponded with J. Wada and A. De Camara regarding July monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/08/22	Corresponded with J. Wada and L. Jang regarding preparation of August monthly operating reports.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/13/22	Corresponded with J. Wada regarding preparation of August monthly operating reports.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
09/14/22	Corresponded with J. Wada regarding August monthly operating report (.1); corresponded with L. Jang regarding insurance renewal (.1)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
09/15/22	Conferred and corresponded with J. Wada regarding schedules (.2).		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
09/21/22	Conferred and corresponded with J. Wada regarding comments on monthly operating reports (.2); corresponded with A. De Camara, J. Wada and L. Jang regarding same (.2).		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
09/22/22	Corresponded with J. Wada, A. De Camara, and L. Jang regarding August monthly operating reports (.2); coordinated filing and service of same (.1)		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
10/19/22	Corresponded with J. Wada regarding preparation of September monthly operating reports (.1); corresponded with L. Jang regarding same (.3)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.

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11/02/22	Reviewed correspondence from J. Wada regarding October bank statements (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/28/22	Corresponded with J. Wada and L. Jang regarding October monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/30/22	Reviewed draft footnotes to Oct monthly operating reports (.1); corresponded with J. Wada and A. De Camara regarding same and final authority to file same with court (.1); coordinated filing and service of same (.4)		
	Jeannie Kim	.60 hrs.	\$ 880.00/hr.
12/08/22	Corresponded with J. Wada regarding November monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/09/22	Correspondence with L. Jang and J. Wada regarding preparation of November monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/14/22	Corresponded with L. Jang and J. Wada regarding preparation of November monthly operating reports.		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
12/15/22	Corresponded with J. Wada and L. Jang regarding November monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
12/19/22	Corresponded with J. Wada regarding Nov. 2022 monthly operating reports (.2); reviewed correspondence from L. Jang regarding adjusted financials in support of Nov. 2022 monthly operating reports (.2)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.

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12/27/22	Corresponded with J. Wada and L. Jang regarding November monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/28/22	Corresponded with J. Wada and L. Jang regarding draft November monthly operating reports.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
12/29/22	Reviewed comments from L. Jang and J. Wada regarding November draft monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/30/22	Corresponded with A. De Camara and J. Wada regarding revised November monthly operating reports (.3); finalized same for filing and service (.4); coordinated filing and service of November monthly operating reports (.2); prepared transmittal to client regarding same (.3)		
	Jeannie Kim	1.20 hrs.	\$ 880.00/hr.
01/03/23	Reviewed correspondence from J. Wada regarding December bank statements (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/03/23	Transmitted conformed copies of November monthly operating reports to client (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/04/23	Corresponded with L. Jang regarding December monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/05/23	Correspondence with J. Wada and L. Jang regarding December monthly operating reports (.2); correspondence with A. De Camara, J. Wada, and L. Jang regarding conformed copies of November monthly operating reports (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.

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01/09/23	Corresponded with N. Rivera (UST) regarding insurance renewal (.2); corresponded with L. Jang and J. Wada regarding same (.1).
	Jeannie Kim .30 hrs. \$ 945.00/hr.
01/10/23	Corresponded with J. Wada and A. De Camara regarding quarterly U.S. Trustee fees (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
01/11/23	Corresponded with A. De Camara and J. Wada regarding 2022 Q4 U.S. Trustee fees (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
01/19/23	Corresponded with L. Jang regarding preparation of December monthly operating reports (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
01/20/23	Corresponded with L. Jang and J. Wada regarding payment of quarterly U.S. Trustee fees (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
01/21/23	Corresponded with A. De Camara regarding payment of U.S. Trustee fees (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
01/24/23	Corresponded with J. Wada regarding draft December monthly operating reports (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
01/26/23	Corresponded with L. Jang regarding comments on draft December monthly operating reports (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.

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01/27/23 Telephone conference with J. Wada regarding December monthly operating reports (.2); reviewed and revised footnotes to same (.1); corresponded with A. De Camara regarding same (.2); prepared certificate of service regarding same (.1); coordinated filing and service of same (.4)

Jeannie Kim 1.00 hrs. \$ 945.00/hr.

01/31/23 Corresponded with A. De Camara, J. Wada, and L. Jang regarding conformed copies of December monthly operating reports (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

02/02/23 Corresponded with J. Wada regarding January monthly operating reports (.1)

Jeannie Kim .20 hrs. \$ 945.00/hr.

02/07/23 Corresponded with J. Wada regarding January monthly operating reports (.1).

Jeannie Kim .10 hrs. \$ 945.00/hr.

02/08/23 Corresponded with L. Jang regarding preparation of January monthly operating reports (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

02/13/23 Corresponded with L. Jang regarding preparation of January monthly operating reports (.1).

Jeannie Kim .10 hrs. \$ 945.00/hr.

02/16/23 Corresponded with J. Wada and L. Jang regarding Jan. monthly operating reports (.2)

Jeannie Kim .20 hrs. \$ 945.00/hr.

02/27/23 Reviewed and revised January monthly operating reports (.1); corresponded with J. Wada and L. Jang regarding same (.2).

Jeannie Kim .30 hrs. \$ 945.00/hr.

03/06/23 Corresponded with J. Wada regarding February monthly operating reports (.1)

Jeannie Kim .10 hrs. \$ 945.00/hr.

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03/10/23	Corresponded with J. Wada and L. Jang regarding accrued fees in connection with preparation of monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
03/14/23	Corresponded with L. Jang regarding Feb. Monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
03/16/23	Corresponded with J. Wada and L. Jang regarding February monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
03/21/23	Corresponded with J. Wada and L. Jang regarding February monthly operating reports (.1); reviewed and analyzed same (.2)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
03/22/23	Reviewed final form of monthly operating reports to file and serve (.1); coordinated filing and service of same (.3); corresponded with L. Jang and J. Wada regarding March monthly operating reports (.1)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
03/23/23	Corresponded with J. Wada and L. Jang regarding February monthly operating reports (.1); corresponded with L. Jang regarding SEC reporting (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
04/07/23	Corresponded with J. Wada regarding March monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/10/23	Corresponded with L. Jang and J. Wada regarding preparation of March monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
04/11/23	Corresponded with L. Jang regarding preparation of March monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.



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04/13/23	Conferred and corresponded with J. Wada regarding payment of U.S. Trustee quarterly fees (.3); conferred with O. Katz regarding same (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
04/14/23	Corresponded with L. Jang and J. Wada regarding quarterly U.S. Trustee fees (.2); corresponded with J. Wada and L. Jang regarding preparation of March monthly operating reports (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
04/21/23	Corresponded with J. Wada and B. Koo regarding payment of U.S. Trustee fees (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
04/25/23	Corresponded with J. Wada regarding March monthly operating reports (.2); corresponded with E. Rofael and J. Blumberg regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/04/23	Reviewed correspondence from E. Stevens regarding status of March monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/05/23	Prepared April monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/08/23	Corresponded with J. Wada and L. Jang regarding preparation April monthly operating reports (.2); reviewed and analyzed draft March monthly operating reports (.1); corresponded with L. Jang regarding same (.1)		
	Jeannie Kim	.40 hrs.	\$ 945.00/hr.
05/09/23	Reviewed and analyzed draft March monthly operating reports (.2); corresponded with J. Wada regarding same (.2); coordinated filing and service of same (.5); corresponded with J. Wada, A. De Camara, and L. Jang regarding conformed copies of same (.1)		
	Jeannie Kim	1.00 hrs.	\$ 945.00/hr.

05/18/23	Corresponded with J. Wada regarding preparation of April monthly operating report (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
05/19/23	Corresponded with L. Jang and J. Wada regarding preparation April monthly operating report (.2); prepared same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
05/23/23	Corresponded with J. Wada and L. Jang regarding preparation April monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
05/24/23	Corresponded with J. Wada regarding preparation of April monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/08/23	Corresponded with D. Picon regarding status of April monthly operating reports (.1); conferred and corresponded with J. Wada regarding same (.4); reviewed and revised same (.2); corresponded with L. Jang regarding May monthly operating reports (.1)		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
06/09/23	Corresponded with J. Wada regarding draft April monthly operating reports (.2); coordinated filing and service of same (.2); corresponded with L. Jang regarding preparation of May monthly operating reports (.1)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
06/12/23	Coordinated filing and service of monthly operating reports (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
06/13/23	Corresponded with L. Jang regarding preparation monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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06/14/23      Corresponded with J. Wada regarding May monthly operating reports (.1);  
corresponded with L. Jang regarding same (.2); corresponded with J. Blumberg  
(UST) and Proskauer team regarding same (.1)

Jeannie Kim      .40 hrs.      \$ 945.00/hr.

07/06/23      Corresponded with J. Wada regarding monthly operating reports (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

07/07/23      Corresponded with J. Wada regarding draft May monthly operating reports (.1);  
corresponded with J. Wada regarding draft June monthly operating reports (.1)

Jeannie Kim      .20 hrs.      \$ 945.00/hr.

07/10/23      Reviewed monthly operating reports for filing (.2); corresponded with J. Wada  
regarding draft monthly operating reports (.1)

Jeannie Kim      .30 hrs.      \$ 945.00/hr.

07/11/23      Corresponded with J. Wada regarding May monthly operating reports (.3);  
coordinated filing and service of same (.3); prepared June monthly operating  
reports (.1)

Jeannie Kim      .70 hrs.      \$ 945.00/hr.

07/12/23      Correspondence with J. Wada regarding preparation of June monthly operating  
reports (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

07/17/23      Corresponded with J. Wada regarding June monthly operating reports (.3);  
reviewed correspondence to B. Koo regarding U.S. Trustee quarterly fees (.2)

Jeannie Kim      .50 hrs.      \$ 945.00/hr.

07/18/23      Corresponded with J. Wada and L. Jang regarding June monthly operating  
reports (.2); correspondence with J. Wada regarding reporting and treatment of  
Consilio fees (.2)

Jeannie Kim      .40 hrs.      \$ 945.00/hr.

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07/20/23	Corresponded with J. Wada regarding preparation of June monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
07/21/23	Reviewed and revised monthly operating reports (.3); corresponded with J. Wada regarding comments on monthly operating reports (.3); corresponded with J. Wada regarding preparation of July monthly operating reports (.2)		
	Jeannie Kim	.80 hrs.	\$ 945.00/hr.
07/24/23	Corresponded with L. Jang regarding June monthly operating reports (.1); correspondence with L. Jang and J. Wada regarding same (.2); coordinated filing and service of same (.3)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
07/25/23	Coordinated filing and service of June monthly operating reports (.1); corresponded with J. Wada and L. Jang regarding same (.1); corresponded with L. Jang regarding July monthly operating reports (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
08/18/23	Corresponded with J. Wada regarding July monthly operating report (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/20/23	Corresponded with J. Wada and L. Jang regarding July monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
08/28/23	Corresponded with J. Wada regarding July monthly operating report (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
09/07/23	Corresponded with J. Wada regarding case budget and preparation of monthly operating reports (.5)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.

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09/19/23	Corresponded with J. Blumberg regarding U.S. Trustee reporting obligations (.1); began preparation of Form B426 (.3); corresponded with J. Wada and L. Jang regarding same (.2)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
09/28/23	Telephone conference with J. Wada regarding July monthly operating reports (.3)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
09/28/23	Reviewed and analyzed draft July monthly operating reports (.2); conferred and corresponded with J. Wada regarding July monthly operating reports (.3); corresponded with L. Jang regarding same (.2)		
	Jeannie Kim	.70 hrs.	\$ 945.00/hr.
09/29/23	Corresponded with J. Wada regarding July monthly operating reports (.2); coordinated filing and service of same (.3)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
10/04/23	Corresponded with J. Wada and L. Jang regarding August monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/13/23	Corresponded with L. Jang and J. Wada regarding preparation of August monthly operating reports (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
10/16/23	Corresponded with L. Jang regarding preparation of August monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
10/24/23	Prepared date for September monthly operating report (.1); corresponded with L. Jang regarding same (.1)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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10/26/23	Corresponded with L. Jang regarding preparation of September monthly operating reports (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/03/23	Corresponded with J. Wada regarding August monthly operating reports (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/07/23	Reviewed and analyzed draft August monthly operating reports (.1); corresponded with L. Jang and J. Wada regarding same (.1).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
11/10/23	Corresponded with J. Wada regarding August monthly operating report (.1); coordinated filing and service of same (.2).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
11/13/23	Corresponded with L. Jang and J. Wada regarding preparation of September monthly operating reports (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/14/23	Corresponded with J. Wada regarding monthly operating reports (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/27/23	Reviewed and analyzed draft monthly operating reports.		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
11/30/23	Corresponded with J. Wada and L. Jang regarding September monthly operating reports (.1); reviewed and analyzed same for filing with court (.1).		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.
12/01/23	Corresponded with L. Jang regarding September monthly operating reports (.1); coordinated filing and service of same (.2).		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.

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12/11/23	Corresponded with L. Jang and J. Wada regarding November monthly operating reports (.1).		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/11/24	Corresponded with L. Jang and J. Wada regarding October monthly operating report and outstanding Consilio invoices (.3).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
01/12/24	Corresponded with J. Wada and L. Jang regarding October monthly operating reports (.2).		
	Jeannie Kim	.20 hrs.	\$ 1005.00/hr.
01/16/24	Corresponded with J. Wada regarding monthly operating report data.		
	Jeannie Kim	.10 hrs.	\$ 1005.00/hr.
01/18/24	Corresponded with L. Jang and J. Wada regarding October monthly operating reports (.1); reviewed and analyzed same (.2).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
01/22/24	Reviewed draft October and November monthly operating reports (.2) and coordinated filing and service of same (.1).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.
01/23/24	Reviewed and analyzed draft November monthly operating reports (.2); coordinated filing and service of same (.1).		
	Jeannie Kim	.30 hrs.	\$ 1005.00/hr.

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*Timekeeper Summary of: US Trustee Compliance/341 Meeting/Debtor  
Interview*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	1.50	\$ 1,255.00	\$ 1,882.50
Jeannie Kim	40.90	\$ 917.64	\$ 37,531.50
<i>Totals</i>	42.40	\$ 929.58	\$ 39,414.00

**Financing/Cash Collections**

04/21/22	Analysis of cash collateral issues.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
04/22/22	Analysis of potential DIP financing and cash collateral matters in connection with funding of the case.		
	Ori Katz	2.00 hrs.	\$ 1255.00/hr.
04/27/22	Conferred re deposit account security interest and cash collateral issues.		
	William R. Wyatt	.40 hrs.	\$ 1345.00/hr.
04/27/22	Meet and confer with counsel for Yesco re cash collateral issues and potential stipulated resolution to same.		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
04/27/22	Reviewed correspondence with M. Kirkpatrick (Legalist) regarding debtor in possession financing needs.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
05/04/22	Attention to adequate protection stipulation re cash collateral with Yesco.		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.



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05/05/22 Reviewed Yesco's comments on draft stipulation regarding adequate protection (.1); corresponded with T. Karcher regarding same (.1); corresponded with A. De Camara regarding same (.1).

Jeannie Kim .30 hrs. \$ 880.00/hr.

05/16/22 Attention to potential DIP financing.

Ori Katz 1.00 hrs. \$ 1255.00/hr.

05/19/22 Revised adequate protection and cash collateral stipulation (.6); developed strategy regarding same (.2).

Jeannie Kim .80 hrs. \$ 880.00/hr.

05/23/22 Corresponded with T. Karcher regarding comments on adequate protection stipulation (.1).

Jeannie Kim .10 hrs. \$ 880.00/hr.

06/21/22 Budget and DIP Financing analysis.

Ori Katz 1.00 hrs. \$ 1255.00/hr.

06/27/22 Attention to potential DIP financing.

Ori Katz 1.00 hrs. \$ 1255.00/hr.

07/01/22 Attention to DIP financing needs in context of overall case game plan (1.5).

Ori Katz 1.50 hrs. \$ 1255.00/hr.

07/28/22 Reviewed correspondence from A. De Camara regarding draft budget in connection with potential debtor in possession financing request (.1).

Jeannie Kim .20 hrs. \$ 880.00/hr.

08/03/22 Attention to DIP financing need and budget (.5).

Ori Katz .50 hrs. \$ 1255.00/hr.

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08/10/22	Attention to DIP financing budget and related motion (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
08/15/22	Attention to DIP financing budget (.6).		
	Ori Katz	.60 hrs.	\$ 1255.00/hr.
08/15/22	Corresponded with A. De Camara and B. Koo regarding proposed debtor in possession financing budget.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
08/16/22	Reviewed reviewed correspondence to B. Koo regarding case status and budget discussion (.1).		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
08/22/22	Finalize DIP budget and response to questions re same (.9).		
	Ori Katz	.90 hrs.	\$ 1255.00/hr.
08/26/22	Work on DIP financing budget and motion (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
08/31/22	Corresponded with J. Wada regarding draft debtor in possession financing budget (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/02/22	Developed strategy to prepare debtor in possession financing motion (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
09/05/22	Drafted debtor in possession financing stipulation (.1); drafted loan and security agreement (1.9).		
	Jeannie Kim	2.00 hrs.	\$ 880.00/hr.
09/06/22	Drafted motion to approve debtor in possession financing (2.4).		
	Jeannie Kim	2.40 hrs.	\$ 880.00/hr.

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09/07/22	Revised debtor in possession loan agreement (.2); revised debtor in possession financing stipulation (1.5); revised motion to approve debtor in possession financing (3.6); drafted proposed debtor in possession financing order (.4).		
	Jeannie Kim	5.70 hrs.	\$ 880.00/hr.
09/14/22	Review and comment on proposed form of DIP loan agreement (1.5).		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.
09/14/22	Drafted debtor in possession financing agreement		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
09/20/22	Reviewed and revised loan documents (.3)		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
09/21/22	Revised debtor in possession loan agreement (.8); revised security agreement (.3); revised motion to approve debtor in possession financing (.1); developed strategy regarding same (.2).		
	Jeannie Kim	1.40 hrs.	\$ 880.00/hr.
09/23/22	Finalize DIP financing package (1.5).		
	Ori Katz	1.50 hrs.	\$ 1255.00/hr.
09/23/22	Reviewed and revised debtor in possession financing agreement (.8); reviewed and revised security agreement (.2); corresponded with A. De Camara and J. Wada regarding revised budget (.2); telephone conference with J. Wada regarding same (.1); corresponded with B. Koo and S. Asher regarding same (.3); corresponded with A. De Camara regarding same (.1)		
	Jeannie Kim	1.70 hrs.	\$ 880.00/hr.
09/26/22	Reviewed comments from A. De Camara regarding draft loan documents (.1); reviewed correspondence to B. Koo and S. Asher regarding same (.1); reviewed correspondence with L. Jang regarding same (.1); revised debtor in possession loan agreement (.4); continued drafting debtor in possession promissory note (.9)		
	Jeannie Kim	1.60 hrs.	\$ 880.00/hr.

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09/28/22	Finalize DIP financing matters (.6).		
	Ori Katz	.60 hrs.	\$ 1255.00/hr.
09/29/22	Continued drafting promissory note (.4); reviewed and revised pledge and security agreement (.8); reviewed and revised loan agreement (.2); corresponded with A. De Camara regarding same (.2)		
	Jeannie Kim	1.60 hrs.	\$ 880.00/hr.
09/30/22	Corresponded with B. Koo and S. Asher regarding debtor in possession financing documents (.2); developed strategy to update motion to approve debtor in possession financing (.7)		
	Jeannie Kim	.90 hrs.	\$ 880.00/hr.
09/30/22	Updated motion in support of DIP financing stipulation. (3.7) Revised DIP financing stipulation (2.4)		
	Gianna E. Segretti	6.10 hrs.	\$ 770.00/hr.
10/03/22	Revised debtor in possession financing stipulation (.4); reviewed motion to approve same (.6)		
	Jeannie Kim	1.00 hrs.	\$ 880.00/hr.
10/04/22	Drafted ex parte application for order shortening time regarding motion to approve debtor in possession financing stipulation (.7); reviewed draft debtor in possession promissory note (.1); revised debtor in possession financing stipulation (.3); revised motion to approve debtor in possession financing stipulation (.7)		
	Jeannie Kim	1.80 hrs.	\$ 880.00/hr.
10/05/22	Drafted declaration of A. De Camara in support of ex parte application regarding order shortening time on motion to approve debtor in possession financing (1.0); drafted declaration of A. De Camara in support of motion to approve debtor in possession financing (.7)		
	Jeannie Kim	1.70 hrs.	\$ 880.00/hr.

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10/06/22	Finalize DIP financing papers (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
10/07/22	Revised debtor in possession financing motion (.2); developed strategy regarding debtor in possession financing motion (.2); corresponded with A. De Camara regarding same (.1); coordinated filing and service of same (.1); corresponded with L. Jang regarding timing of upcoming expenses (.2)		
	Jeannie Kim	.80 hrs.	\$ 880.00/hr.
10/19/22	Reviewed and analyzed U.S. Trustee's comments on debtor in possession financing motion (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.
10/26/22	Discussion with creditor re their comments to the DIP financing motion (.3). Review redline and revise DIP (.4). Prepare for DIP financing hearing (.3).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
10/26/22	Corresponded with J. Blumberg regarding responses to U.S. Trustee's comments on debtor in possession financing motion (.5); reviewed and revised proposed order in connection with same (.8); corresponded with A. De Camara regarding same (.2); reviewed correspondence with E. Winston regarding same (.1)		
	Jeannie Kim	1.60 hrs.	\$ 880.00/hr.
10/27/22	Corresponded with E. Winston regarding comments on revised proposed order regarding debtor in possession financing (.1); corresponded with J. Blumberg regarding same (.2); reviewed and analyzed Yesco objection (.4); corresponded with A. De Camara regarding same (.3)		
	Jeannie Kim	1.00 hrs.	\$ 880.00/hr.
10/28/22	Drafted notice of revised proposed order granting motion to approve debtor in possession financing per comments from U.S. Trustee and other creditor (.2)		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.

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10/31/22	Developed strategy to reply to Yesco regarding objection to debtor in possession financing motion (.1); reviewed correspondence from A. De Camara regarding same (.2); reviewed correspondence with E. Winston regarding same (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/02/22	Reviewed and revised draft reply to Yesco opposition (.2); coordinated filing and service of same (.4); reviewed correspondence from B. Koo regarding debtor in possession financing terms (.1); corresponded with B. Koo and A. De Camara regarding conformed copy of reply to Yesco opposition to debtor in possession financing motion (.1); prepared for hearing on debtor in possession financing motion (.2)		
	Jeannie Kim	1.00 hrs.	\$ 880.00/hr.
11/03/22	Meet and confer with Yesco counsel in an attempt to resolve DIP financing objections (.9).		
	Ori Katz	.90 hrs.	\$ 1255.00/hr.
11/04/22	Meet and confer with Yesco re DIP financing opposition (1.4).		
	Ori Katz	1.40 hrs.	\$ 1255.00/hr.
11/07/22	Developed strategy regarding resolution of Yesco objection to debtor in possession financing motion (.2); corresponded with A. Rosales (USBC) and T. Karcher regarding same (.2)		
	Jeannie Kim	.40 hrs.	\$ 880.00/hr.
11/09/22	Work on documenting agreed order re DIP financing motion (1.0).		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
11/09/22	Revised proposed order granting debtor in possession financing motion (.4); reviewed further revised draft of same (.1); reviewed correspondence with T. Karcher regarding same (.2)		
	Jeannie Kim	.70 hrs.	\$ 880.00/hr.

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11/10/22	Attend hearing on DIP financing (.5).		
	Ori Katz	.50 hrs.	\$ 1255.00/hr.
11/10/22	Update to debtors re hearing and attention to next steps in connection with DIP financing (.7).		
	Ori Katz	.70 hrs.	\$ 1255.00/hr.
11/14/22	Follow up re critical expenses to be paid from DIP financing (.3).		
	Ori Katz	.30 hrs.	\$ 1255.00/hr.
11/14/22	Corresponded with U.S. Bankruptcy Court regarding duplicate order regarding debtor in possession financing motion (.1); reviewed correspondence with A. De Camara, O. Katz, and B. Koo regarding status of debtor in possession financing funding (.2)		
	Jeannie Kim	.30 hrs.	\$ 880.00/hr.
11/14/22	Reviewed and analyzed potential DIP financing terms.		
	Koray Erbas	.30 hrs.	\$ 655.00/hr.
11/22/22	Reviewed correspondence from A. De Camara to B. Koo regarding debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
11/25/22	Reviewed correspondence with B. Koo and S. Asher regarding debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/08/22	Reviewed correspondence between A. De Camara and L. Jang regarding status of debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
12/13/22	Reviewed correspondence with A. De Camara, B. Koo, and S. Asher regarding debtor in possession financing.		
	Jeannie Kim	.20 hrs.	\$ 880.00/hr.

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12/27/22	Reviewed correspondence with B. Koo regarding debtor in possession financing.		
	Jeannie Kim	.10 hrs.	\$ 880.00/hr.
01/06/23	Attention to the need for additional DIP financing and upcoming second motion re same (1.6).		
	Ori Katz	1.60 hrs.	\$ 1355.00/hr.
01/09/23	Reviewed and revised Anavrin stipulation (.2); corresponded with Proskauer team and T. Keller regarding same (.1)		
	Jeannie Kim	.30 hrs.	\$ 945.00/hr.
01/12/23	Discussion with Mr. Koo re further DIP financing (.4).		
	Ori Katz	.40 hrs.	\$ 1355.00/hr.
01/12/23	Reviewed and revised Anavrin stipulation (.1); prepared order approving same (.1); corresponded with T. Keller regarding same (.1); corresponded with J. Wada regarding debtor in possession financing budget (.2)		
	Jeannie Kim	.50 hrs.	\$ 945.00/hr.
01/13/23	Follow up with Mr. Koo re DIP financing (.2).		
	Ori Katz	.20 hrs.	\$ 1355.00/hr.
01/13/23	Reviewed correspondence from B. Koo regarding debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/14/23	Reviewed correspondence from A. De Camara regarding debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
01/23/23	Reviewed correspondence from B. Koo regarding debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.



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02/17/23	Attention to need for further DIP financing, new budget, and potential second motion to borrow on an unsecured basis (2.5).
	Ori Katz 2.50 hrs. \$ 1355.00/hr.
02/23/23	Corresponded with J. Wada, A. De Camara, and L. Jang regarding funding of debtor in possession financing (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
03/10/23	Telephone conference with A. De Camara regarding debtor in possession financing (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
03/28/23	Corresponded with A. De Camara and B. Koo regarding debtor in possession financing (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
03/30/23	Reviewed status of debtor in possession financing and retention (.1); corresponded with A. De Camara regarding litigation strategy (.1)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
05/05/23	Reviewed correspondence between L. Jang and J. Wada regarding operating expenses (.2)
	Jeannie Kim .20 hrs. \$ 945.00/hr.
05/05/23	Corresponded with J. Wada regarding updates to debtor in possession financing budget (.1)
	Jeannie Kim .10 hrs. \$ 945.00/hr.
05/08/23	Corresponded with O. Katz and A. Cottrell regarding updated debtor in possession financing budget (.1); corresponded with J. Wada regarding same (.2)
	Jeannie Kim .30 hrs. \$ 945.00/hr.

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05/10/23	Corresponded with J. Wada regarding debtor in possession financing budget (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/14/23	Conferred and corresponded with J. Wada regarding funding of debtor in possession financing (.2); corresponded with A. De Camara, J. Wada and L. Jang regarding same (.4)		
	Jeannie Kim	.60 hrs.	\$ 945.00/hr.
06/15/23	Corresponded with J. Wada regarding status of debtor in possession financing funding (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.
06/20/23	Corresponded with L. Jang regarding funding of debtor in possession financing (.1)		
	Jeannie Kim	.10 hrs.	\$ 945.00/hr.

*Timekeeper Summary of: Financing/Cash Collections*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
William R. Wyatt	0.40	\$ 1,345.00	\$ 538.00
Ori Katz	28.10	\$ 1,271.73	\$ 35,735.50
Gianna E. Segretti	6.10	\$ 770.00	\$ 4,697.00
Koray Erbas	0.30	\$ 655.00	\$ 196.50
Jeannie Kim	34.70	\$ 886.18	\$ 30,750.50
<i>Totals</i>	<i>69.60</i>	<i>\$ 1,033.30</i>	<i>\$ 71,917.50</i>

**Tax Issues**

02/14/23	Corresponded with L. Jang and A. De Camara regarding preparation of 2022 tax returns (.2)		
	Jeannie Kim	.20 hrs.	\$ 945.00/hr.

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02/24/23      Corresponded with L. Jang, J. Wada, and A. De Camara regarding tax liabilities due (.3)

Jeannie Kim      .30 hrs.      \$ 945.00/hr.

02/27/23      Conferred with J. Wada regarding tax liabilities (.2); corresponded with L. Jang, J. Wada, and A. De Camara regarding proposed tax payments (.4)

Jeannie Kim      .60 hrs.      \$ 945.00/hr.

05/08/23      Reviewed correspondence to B. Koo regarding use of debtor in possession financing funds to pay FTB taxes (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

05/15/23      Corresponded with J. Wada regarding payment of CA FTB invoice (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

05/17/23      Corresponded with B. Koo regarding payment of FTB taxes (.1)

Jeannie Kim      .10 hrs.      \$ 945.00/hr.

12/11/23      Corresponded with J. Wada and L. Jang regarding K-1 reserve (.2).

Jeannie Kim      .20 hrs.      \$ 945.00/hr.

01/17/24      Attention to issues related to preparation of final tax returns.

Ori Katz      1.10 hrs.      \$ 1465.00/hr.

01/17/24      Developed strategy regarding tax and K-1 reserves (.6); telephone conference with J. Crom regarding potential engagement to prepare tax returns (.4); corresponded with H. Tang regarding tax preparation (.1).

Jeannie Kim      1.10 hrs.      \$ 1005.00/hr.

01/18/24      Reviewed research regarding potential tax penalties (.1); corresponded with A. De Camara and J. Wada regarding same (.2).

Jeannie Kim      .30 hrs.      \$ 1005.00/hr.

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*Timekeeper Summary of: Tax Issues*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	1.10	\$ 1,465.00	\$ 1,611.50
Jeannie Kim	3.00	\$ 973.00	\$ 2,919.00
<i>Totals</i>	4.10	\$ 1,105.00	\$ 4,530.50

**General Bankruptcy Advice/Opinions**

04/12/22 Telephone conference with H. Khanbai, S. Asher, and O. Katz regarding status of Cayman litigation (.4); corresponded with H. Khanbai regarding same (.2).

Jeannie Kim .60 hrs. \$ 880.00/hr.

04/12/22 Drafted voluntary petition and list of equity holders for Cayman Fund.

Koray Erbas 2.20 hrs. \$ 655.00/hr.

04/13/22 Reviewed and revised petition and related documents in anticipation of commencement of chapter 11 case (.3); corresponded with H. Khanbai, B. Koo, A. De Camara, L. Jang, S. Asher regarding Cayman litigation status (.6).

Jeannie Kim .90 hrs. \$ 880.00/hr.

04/13/22 Revised the voluntary petition and list of equity holders for Cayman Fund.  
Drafted the Corporate Ownership Statement.

Koray Erbas .90 hrs. \$ 655.00/hr.

04/14/22 Reviewed lien search results for Cayman Fund.

Jeannie Kim .10 hrs. \$ 880.00/hr.

04/17/22 Correspondence to P. Sherwood and N. Smith regarding first day hearing and response to queries regarding Cayman financials (.2); corresponded with L. Jang regarding Cayman audited financials (.2).

Jeannie Kim .40 hrs. \$ 880.00/hr.

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04/19/22	Attention to filing of Cayman Fund.		
	Ori Katz	1.00 hrs.	\$ 1255.00/hr.
04/19/22	Developed strategy regarding commencement of Cayman Fund chapter 11 (.2); prepared Cayman petition and related documents for filing (.4); reviewed and revised joint administration motion (1.7); drafted declaration of A. De Camara in support of same (.9); developed strategy regarding filing of Cayman petition, schedules and SOFAs, and adversary proceeding complaint (.2); reviewed and revised application to appoint responsible individual (.3); corresponded with L. Jang and A. De Camara regarding strategy to commence Cayman Fund chapter 11 case (.2); reviewed updated accounts payable schedule (.1).		
	Jeannie Kim	4.00 hrs.	\$ 880.00/hr.
04/19/22	Revised the voluntary petition for Cayman Fund. Drafted the list of equity holders and list of creditors. Reviewed the addresses of creditors and list of equity holders for Cayman Fund. Corresponded with Lae Jang re the Cayman Fund equity holder and creditor information.		
	Koray Erbas	2.60 hrs.	\$ 655.00/hr.
04/20/22	[Cayman] Corresponded with L. Jang regarding preparation of Cayman petition for filing (.3); reviewed and revised ex parte motion for joint administration of cases (Cayman) (.1); reviewed and revised declaration of A. De Camara in support of same (.1); reviewed and revised Cayman corporate ownership statement (.1); prepared A. De Camara declaration in support of Cayman petition documents (.1); reviewed and revised Cayman Fund written consent authorizing chapter 11 filing (.2); reviewed and revised consolidated list of top 20 unsecured creditors (.2); reviewed and revised draft order granting application to designate A. De Camara as responsible individual (.1); reviewed and revised petition (.2); developed strategy Cayman case commencement (.3); corresponded with H. Khanbhai regarding Campbells retainer balance (.2).		
	Jeannie Kim	1.90 hrs.	\$ 880.00/hr.
04/20/22	Prepared the mailing matrix, and revised the list of creditors for Cayman Fund.		
	Koray Erbas	1.20 hrs.	\$ 655.00/hr.
04/21/22	Analysis of next steps in regard to the Cayman proceeding.		
	Ori Katz	.70 hrs.	\$ 1255.00/hr.

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04/21/22 Finalized chapter 11 petition and related documents for client review and authorization to file (1.9); corresponded with B. Koo, L. Jang, A. De Camara, and S. Asher to request review and authorization to file (.3); filed and served petition and related documents (.8).

Jeannie Kim 3.00 hrs. \$ 880.00/hr.

04/21/22 Prepared Cayman petition, authorizing resolutions, De Camara declaration, corporate ownership statement, list of equity holders, declaration under penalty of perjury and application of joint administration of cases for Cayman Fund.

Koray Erbas 1.40 hrs. \$ 655.00/hr.

*Timekeeper Summary of: General Bankruptcy Advice/Opinions*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	1.70	\$ 1,255.00	\$ 2,133.50
Koray Erbas	8.30	\$ 655.00	\$ 5,436.50
Jeannie Kim	10.90	\$ 880.00	\$ 9,592.00
<i>Totals</i>	20.90	\$ 821.15	\$ 17,162.00

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<b><u>Timekeeper</u></b>	<b><u>Hours</u></b>	<b><u>Average Rate/Hr</u></b>	<b><u>Dollars</u></b>
Amanda L. Cottrell	235.30	\$ 1,025.40	\$ 241,275.50
Ori Katz	243.10	\$ 1,335.65	\$ 324,695.50
Michael Lauter	1.10	\$ 995.00	\$ 1,094.50
Johneth C. Park	1.40	\$ 1,175.00	\$ 1,645.00
Jason R. Schendel	.40	\$ 1,095.00	\$ 438.00
William R. Wyatt	.40	\$ 1,345.00	\$ 538.00
Matt Benz	34.90	\$ 650.00	\$ 22,685.00
Koray Erbas	40.50	\$ 673.89	\$ 27,292.50
Steven G. Gersten	434.40	\$ 943.28	\$ 409,760.50
Jeannie Kim	416.80	\$ 925.37	\$ 385,694.00
Matt R. Klinger	.90	\$ 915.00	\$ 823.50
Eduardo G. Linares	3.80	\$ 695.00	\$ 2,641.00
Scott Natsuhara	5.30	\$ 650.00	\$ 3,445.00
Gianna E. Segretti	19.10	\$ 770.00	\$ 14,707.00
Lauryn Vigil	12.40	\$ 210.00	\$ 2,604.00
Rachel Weir	9.80	\$ 210.00	\$ 2,058.00

**Total Fees for Professional Services****\$ 1,441,397.00**

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<b><u>Phase</u></b>	<b><u>Hours</u></b>	<b><u>Dollars</u></b>
Case Administration	60.40	\$ 56,770.50
Asset Analysis & Recovery	20.80	\$ 21,747.50
Asset Disposition	59.50	\$ 69,012.50
Meetings of and Communications with Creditors	32.90	\$ 33,644.50
Fee/Employment Applications & Statements	96.00	\$ 74,739.00
Other Contested Matters (excluding assumption/rejection motions)	1011.40	\$ 1,010,644.00
Non-Working Travel	25.00	\$ 24,295.00
Case Administration - General	15.00	\$ 15,974.00
Business Operations	1.60	\$ 1,546.00
US Trustee Compliance/341 Meeting/Debtor Interview	42.40	\$ 39,414.00
Financing/Cash Collections	69.60	\$ 71,917.50
Tax Issues	4.10	\$ 4,530.50
General Bankruptcy Advice/Opinions	20.90	\$ 17,162.00



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**SUMMARY OF DISBURSEMENTS**

04/18/22	O. Katz - Court day	7.00
10/03/22	A. Cottrell - Flight to San Jose for in person hearing on Motion to Dismiss.	877.96
10/10/22	A. Cottrell - Uber from airport to hotel in San Jose for hearing on Motion to Dismiss.	19.44
10/11/22	A. Cottrell - Hotel stay in San Jose for hearing on Motion to Dismiss.	170.88
10/11/22	A. Cottrell - Uber from hotel to airport in San Jose for hearing on Motion to Dismiss.	18.82
10/11/22	A. Cottrell - Parking at Lovefield Airport for a hearing in San Jose.	32.00
10/11/22	O. Katz - Parking- attended Hearing re Motion to Dismiss & Initial Scheduling Conference	4.00
02/07/23	A. Cottrell - Airfare 3/7/23 from DFW to SFO for the Formation Client Meeting and Deposition Prep.	268.90
03/07/23	A. Cottrell - Uber from the airport to the Hotel in San Francisco for Formation Client Meeting and Deposition Prep.	53.25
03/09/23	A. Cottrell - Uber from SF office to Airport after Formation client meeting/depo prep.	99.03
03/09/23	A. Cottrell - Hotel stay for Formation client meeting/depo prep (3/9)	587.11
03/11/23	A. Cottrell - DFW Airport Parking for Formation client meeting/depo prep (3/7-3/8)	36.00
08/17/23	S. Gersten - Airfare 8/21/23 to travel to San Francisco for the Deposition of Lae Jang.	367.90
08/21/23	A. Cottrell - Airfare 8/22/23-8/23/23 from DFW airport to San Fransisco airport for client deposition.	735.80
08/22/23	A. Cottrell - Uber from the airport to the hotel. - Deposition	102.74
08/22/23	S. Gersten - Uber from the airport to hotel in San Francisco for the Deposition of Lae Jang.	51.26
08/23/23	A. Cottrell - Uber from the hotel to the client meeting/deposition location.	19.52
08/23/23	S. Gersten - Lodging 8/21/23-8/23/23- Hotel stay in San Francisco for the Deposition of Lae Jang.	727.92
08/23/23	S. Gersten - Airfare 8/24/23 for the flight from San Francisco to DFW after the Deposition of Lae Jang.	367.90
08/23/23	A. Cottrell - Lodging 8/22/23-8/23/23- Hotel stay for the deposition of Lae Jang.	400.50
08/24/23	S. Gersten - Parking at DFW airport for the duration of the Deposition of Lae Jang.	90.00
08/24/23	S. Gersten - Uber from the hotel to the deposition location for the Deposition of Lae Jang.	11.58
08/24/23	S. Gersten - Uber from the deposition location to the airport after the Deposition of Lae Jang.	52.82
08/24/23	S. Gersten - Lodging 8/23/23-8/24/23- Hotel stay for the second	348.17

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	night for the duration of the Deposition of Lae Jang.	
08/27/23	S. Gersten - Airfare 8/28/23 from DFW to San Francisco for the deposition of Brian Koo.	367.90
08/29/23	S. Gersten - Airfare 8/30/23 from San Francisco to DFW after the deposition of Brian Koo.	367.90
08/29/23	S. Gersten - Lyft ride from the airport to the hotel the night before the deposition of Brian Koo.	55.81
08/30/23	S. Gersten - Uber ride to the airport from the office after the deposition of Brian Koo.	49.90
08/30/23	S. Gersten - Hotel Lodging 8/28/23-8/30/23- Charges for the hotel stay during the duration of the deposition of Brian Koo.	1,064.42
08/31/23	S. Gersten - Parking at DFW airport for the duration of the deposition of Brian Koo.	81.00
10/06/23	A. Cottrell - Airfare (10/16/23-10/17/23) for travel to San Jose for Formation hearing	681.80
10/16/23	A. Cottrell - Uber from the San Jose airport to the hotel in San Jose for the Formation/Yesco Hearing.	51.90
10/17/23	A. Cottrell - Hotel lodging charges (10/16/23-10/17/23) in San Jose, CA for a hearing in Formation/Yesco.	618.56
10/17/23	O. Katz - Parking - Hearing	13.00
10/17/23	A. Cottrell - Uber from the office to the San Francisco Airport	109.16
10/18/23	A. Cottrell - Parking at DFW airport for the duration of the hearing.	54.00
10/24/23	O. Katz - court house	9.00
02/15/24	J. Kim - Attend motion hearing re Formation 73VG-350107	10.95
04/11/22	J. Kim - Filing fee - First Day Motions	3,476.00
04/22/22	J. Kim - Additional filing fees re First Day Motions	1,738.00
04/28/22	Filing Fee - Complaint	350.00
05/02/22	PACER - Filing fee	32.00
09/13/22	A. Cottrell - Certificate of Good Standing from the Texas State bar to Pro Hac Vice into a case in CA.	50.00
09/13/22	A. Cottrell - Certificate of Good Standing from the US District Court, Northern District of Texas to Pro Hac Vice into a case in CA.	20.00
09/20/22	Filing fee	317.00
06/30/23	PACER fees for various matters.	4.80
08/16/23	S. Gersten - Filing fee to the California Northern Bankruptcy Court for S. Gersten's Pro Hac Vice application.	317.00
01/26/24	J. Kim - Filing fee (Sale motion)	199.00
04/19/23	PACER Court Services	15.20
04/11/22	Federal Express on 04/11/22	82.07
04/11/22	Federal Express on 04/11/22	18.86
04/11/22	Federal Express on 04/11/22	37.51
04/11/22	Federal Express on 04/11/22	18.65
04/11/22	Federal Express on 04/11/22	18.86
04/11/22	Federal Express on 04/11/22	51.34

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04/11/22	Federal Express on 04/11/22	51.34
04/11/22	Federal Express on 04/11/22	82.07
03/09/23	Federal Express on 03/09/23	69.85
04/29/22	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 4/30/2022	12.30
08/26/22	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 8/31/2022	6.70
09/15/22	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 9/30/2022	16.80
10/07/22	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 10/31/2022	20.50
12/30/22	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 12/31/2022	127.30
01/02/23	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 1/31/2023	70.50
01/27/23	File & ServeExpress. Invoice # 202301003953501. Invoice Date: 2/1/2023. Transaction ID: 138695611. By: J. Kim. Documents: Document Fee	40.00
08/28/23	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 8/31/2023	8.80
09/28/23	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 9/30/2023	5.60
10/25/23	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 10/31/2023	5.00
01/30/24	PACER (Public Access to Court Electronic Records). Customer Number: SMRHFirmUser. Statement Date: 1/31/2024	6.60
04/27/22	Lexis research by Kim, Jeannie on 4/27/2022.	85.50
04/28/22	Lexis research by Kim, Jeannie on 4/28/2022.	85.50
12/16/22	Lexis research by Kim, Jeannie on 12/16/2022.	85.50
12/15/23	Lexis research by Kim, Jeannie on 12/15/2023.	263.70
02/15/24	J. Kim - Attend motion hearing re Formation 73VG-350107	67.21
03/09/23	Client lunch meeting	81.45
08/30/23	Deposition lunch	127.20
08/30/23	J. Kim - Process Serve - deposition subpoena on Gu Hwan Nam.	462.25
08/30/23	J. Kim - Process Serve - deposition subpoena on Se Young Choi.	462.25
08/25/23	Veritext - Inv#6802583 - Deposition and transcript charges for the deposition of Rei Young (Lae) Jang.	1,416.15
08/26/23	Veritext - Inv#6802635 - Deposition of Rei Young Jang	733.85
08/29/23	Transperfect Translations - Inv#2889279 - English to Korean interpretation	10,106.25
10/10/22	A. Cottrell - Lunch in Hotel in San Jose for hearing on Motion to Dismiss.	15.42
10/10/22	A. Cottrell - Dinner in the Hotel in San Jose for hearing on Motion to Dismiss.	42.87

73VG-350107 Formation Group Fund - Restructuring  
Ori KatzFebruary 28, 2024  
Invoice 380100495  
Page 170 of 170

10/11/22	A. Cottrell - Breakfast in the Hotel in San Jose for hearing on Motion to Dismiss.	23.88
08/23/23	S. Gersten - Hotel Dinner for the second night for the duration of the Deposition of Lae Jang.	32.26
08/23/23	S. Gersten - Dinner at the hotel on 8.22.23 in San Francisco for the Deposition preparation of Lae Jang.	28.24
10/16/23	A. Cottrell - Lunch at the hotel restaurant while in San Jose for Formation/Yesco Hearing.	49.31
10/16/23	A. Cottrell - Dinner at the hotel the night before the Formation/Yesco hearing.	62.95
10/17/23	A. Cottrell - Lunch at the hotel before checking out after the Formation/Yesco Hearing.	31.30
12/14/23	Westlaw research by Kim, Jeannie, on 12/14/2023.	1,492.20
12/15/23	Westlaw research by Kim, Jeannie, on 12/15/2023.	1,161.00
	Color Copies	43.75
	Duplication	2,070.40
	Postage	13.94

**Total Disbursements****\$ 35,299.78**

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**Exhibit 4**  
**Letter to Client Regarding Application**

Ori Katz  
415.774.3238 direct  
okatz@sheppardmullin.com

February 29, 2024

Our File Number: 73VG-350107

**VIA E-MAIL**

Sherwood Partners  
Attn: Andrew De Camara, Chief Restructuring  
Officer for Formation Group Fund I, L.P., et al.  
1801 Century Park East, Ste 1420  
Los Angeles, CA 90067  
E-Mail: ad@sherwoodpartners.com

Re: In re Formation Group Fund I, L.P. et al. (Case No. 22-50302)  
Sheppard Mullin's First Interim Fee Application

Dear Mr. De Camara:

We enclose an electronic, PDF copy of our first and final application for award and allowance of compensation and reimbursement of expenses (the "Sheppard First and Final Application") incurred as counsel for Formation Group Fund I, L.P., et al., in the above-referenced chapter 11 bankruptcy cases, my supporting declaration, and all supporting exhibits.

A debtor in possession must exercise reasonable business judgment in monitoring the fees and expenses of its professionals, which amounts will be paid by the debtor's bankruptcy estate, subject to court approval. We invite you to discuss with us any objections, concerns or questions you may have regarding the Sheppard First Interim Fee Application. The Office of the United States Trustee will also accept your comments. The bankruptcy court will consider the Sheppard First Interim Fee Application, and any objections to it asserted and filed by any party in interest on or before March 14, 2024, or fourteen days before the hearing on the Sheppard First Interim Fee Application, which has been scheduled for March 21, 2024, at 10:00 a.m.



Andrew De Camara  
February 29, 2024  
Page 2

If you have no objections to the Sheppard First and Final Fee Application, please simply let me know by email at your earliest convenience. Should you have any questions, objections or other concerns regarding the Sheppard First ad Final Fee Application please do not hesitate to contact me.

Very truly yours,

*/s/ Ori Katz*

Ori Katz  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
Enclosures

cc: Brian Koo  
Lae Jang

SMRH:4889-5119-8378.1

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**Exhibit 5**  
**Professional Biographies of Sheppard Mullin Attorneys**





## → Ori Katz

### Partner

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Seventeenth Floor  
San Francisco, CA 94111

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okatz@sheppardmullin.com

Ori Katz is a partner in the Finance and Bankruptcy Practice Group in the firm's San Francisco office and a member of the firm's Executive Committee.

### Areas of Practice

Ori specializes in business bankruptcies and other aspects of insolvency law. He has represented debtors, individual creditors, creditors' committees, parties purchasing assets out of bankruptcy and parties involved in bankruptcy litigation. He has successfully reorganized companies in a wide range of industries, including real estate, retail, construction, biotech, agriculture, telecommunications, media and the internet. He has also represented lenders in connection with receiverships, loan workouts, restructurings, foreclosures and borrower bankruptcies, and acted as receivership counsel in connection with various appointments. Ori is a frequent speaker on matters relating to bankruptcy and insolvency law.

### Honors

Best Lawyers in America (Litigation - Bankruptcy), *Best Lawyers*, 2024

Top Bankruptcy Lawyer, *Daily Journal*, 2022

Fellow, American College of Bankruptcy

500 Leading U.S. Bankruptcy and Restructuring Lawyers, *Lawdragon*, 2020, 2022-2023

Leading Bankruptcy/Restructuring Lawyer, *Chambers and Partners*, 2013-2023

Best Lawyers in America (Bankruptcy and Creditor/Debtor Rights/Insolvency and Reorganization Law), *Best Lawyers*, 2017-2024

Lawyer of the Year, (Bankruptcy and Creditor/Debtor Rights/Insolvency and Reorganization Law), *Best Lawyers*, 2019, 2023

Northern California Super Lawyer, *Super Lawyers*, 2014-2024

Northern California Rising Star, *Super Lawyers*, 2010-2013

Listed in *Legal 500*, 2012

Co-Chair, *California Bankruptcy Forum*, 23rd Annual Insolvency Conference (May 2011)

## Articles

### Finance & Bankruptcy Law Blog

- "Dealing with the Financial Impact of the Coronavirus," March 6, 2020

## Media Mentions

Imperial Toy Plans Sale to Ja-Ru  
*The Deal*, 11.19.2019

Patriot National D&O Payouts Can Resume, Judge Says  
*Law360*, 04.02.2018

Lawsuit Claims Profit Rights to Martin Scorsese's 'Silence' Were Fraudulently Transferred  
*The Hollywood Reporter*, 02.01.2017

Crunchies Food Snags Disclosure Statement Approval  
*The Deal Pipeline*, 05.07.2015

Crunchies Wins Sale Nod  
*The Deal Pipeline*, 10.23.2014

Vail Lake wins fourth exclusivity extension  
*The Deal Pipeline*, 09.26.2014

Vail Lake wins sale approval  
*The Deal Pipeline*, 09.02.2014

Speyside Fund to acquire Pacific Steel assets  
*The Deal Pipeline*, 08.07.2014

Easy Life Furniture to liquidate in Chapter 11  
*The Deal Pipeline*, 05.02.2014

PSC secures final DIP use  
*The Deal Pipeline*, 04.11.2014

Vail Lake extends exclusivity  
03.20.2014

MMFX exits Chapter 11  
*Daily Deal/The Deal*, 08.12.2011

MMFX Steel set to exit in August  
*Daily Deal/The Deal*, 07.27.2011

MMFX wins access to reduced DIP  
*Daily Deal/The Deal*, 03.03.2011

MMFX seeks final clearance to use DIP  
*Daily Deal/The Deal*, 12.23.2010

MMFX Steel joins Canadian affiliates in Ch. 11  
*Daily Deal/The Deal*, 12.14.2010

## Speaking Engagements

Speaker, *CRYPTO COLLAPSE: What Does 2023 Hold in Store for the Crypto World?*, presented by Turnaround Management Association, January 25, 2023

Speaker, *Navigating Bankruptcy Without Sinking the Ship*, presented by ADR Services, Inc., July 27, 2022

Speaker, *Cryptocurrency and Blockchain: What Is It? How Does It Apply to Restructurings and Bankruptcy?*, presented to the ABI Winter Leadership Conference, December 11, 2021

Speaker, *Delivering The Sizzle and The Steak In Sub. Chapter V Cases*, presented to the Central California Bankruptcy Association 2021 Institute, September 23, 2021

Speaker, Subchapter V: Practical Insights from the Leading Edge, presented to the Northern California Chapter, Turnaround Management Association, March 31, 2021

Speaker, *Techniques in Valuing and Selling Closely Held Businesses*, presented to the Bay Area Bankruptcy Forum, January 14, 2020

Speaker, *The Party's Over; Now, Who's Cleaning Up?: The Post-Apocalyptic Landscape Following a § 363 Sale*, presented at the ABI's Winter Leadership Conference, December 6, 2019

Speaker, *Recent Developments in Business Bankruptcy*, presented at the Bar Association of San Francisco's Commercial Law and Bankruptcy Section's Annual Symposium, October 22, 2019 and November 6, 2019

Speaker, *Business Bankruptcy Developments in 2019*, presented at the Western Bankers Association, Bank Counsel Seminar, October 10, 2019

Speaker, *Recent Developments in Business Bankruptcy*, presented at the Bar Association of San Francisco's Commercial Law and Bankruptcy Section's Annual Symposium, October 23, 2018 and November 7, 2018

Speaker, *Insolvency Issues in Business Cases*, presented by the Sacramento Valley Bankruptcy Forum, 2018 Fall Symposium, November 9, 2018

Speaker, *Bankruptcy & Tax: Navigating the Perilous Waters of the New Tax Code*, presented by the Bar Association of San Francisco's Commercial Law and Bankruptcy section, September 11, 2018

Speaker, *The Fight Between Secured Creditors and Junior or Unsecured Creditors in Bankruptcy*, presented at the ABI's Bankruptcy Battleground West Conference, March 6, 2018

Speaker *Recent Developments in Business Bankruptcy*, presented at the Bar Association of San Francisco's Commercial Law and Bankruptcy Section's Annual Symposium, November 7, 2017

Speaker, *Gift-Wrapped Sales and Structured Dismissals*, presented by the Bay Area Bankruptcy Judges' Conference, April 14, 2017

Speaker, *Cutting Edge Chapter 11 Issues*, presented by the Central California Bankruptcy Institute, September 23, 2016

Speaker, *Technology and IP – Distressed Asset Sale Processes and Issues*, presented by the Special Assets Management Association, October 22, 2015

Speaker, *Stacking the Deck: Identifying and Protecting Assets and Pre-Petition Business Performance*, presented by the California Bankruptcy Forum, 27th Annual Insolvency Conference, May 16, 2015

Speaker, *Individual Chapter 11 Cases*, presented at the ABI's Bankruptcy Battleground West Conference, March 24, 2015

Moderator, *Financing the Business Receivership*, presented by the California Receiver's Forum at the Loyola VI Complex Case Symposium, January 24, 2015

Speaker, *5th Annual Year End Restructuring Market Review*, presented by the Turnaround Management Association, November 20, 2014

Speaker, *All the World's a Stage (Mock Cross Examination)*, presented by the National Conference of Bankruptcy Judges, 88th Annual Meeting, Plenary Session, October 10, 2014

Speaker, *Hot Topics: Substantive Consolidation in Bankruptcy Cases*, presented by the California State Bar, Business Law Section, Webinar, May 29, 2014

Moderator, *A Judges' Discussion of Best Practices for Effective Advocacy Revisited*, presented by the California Bankruptcy Forum, 26th Annual Insolvency Conference, May 17, 2014

Speaker, *Mock Hearing: Confirmation Issues*, presented at the ABI's 25th Annual Winter Leadership Conference, December 6, 2013

Speaker, *363 Sales – Is the Fast Track the Right One for You?*, presented by the ABI Southwest Bankruptcy Conference, August 23, 2013

Speaker, *Receivership vs. ABC vs. Bankruptcy*, presented by the California Receiver's Forum at the Loyola V Complex Case Symposium, January 19, 2013

Speaker, *Business Insolvency Essentials: Chapter 11 Bankruptcy and More*, presented by Pincus Professional Education, September 28, 2012

Speaker, *Special Asset Considerations in Chapter 11 Cases*, presented by the ABI Southwest Bankruptcy Conference, September 9, 2011

Speaker, *Real Estate Issues in Bankruptcy Cases*, presented by The Business, Commercial & Bankruptcy Law Section of the Barristers Club, December 6, 2010.

Speaker, *Recent Developments in Asset Sales*, presented by the California Law and Bankruptcy Section of the Bar Association of San Francisco, October 24, 2008

Program Moderator, *Bankruptcy Practice 101: An In-Depth Guide to Practice in the U.S. Bankruptcy Courts Taught by Current and Former Law Clerks*, February 8, 2008

## Memberships

Member, Insolvency Law Committee, Business Law Section, State Bar of California

Member, Bay Area Bankruptcy Forum

Member, State Bar of California

Member, American Bar Association

Member, Bar Association of San Francisco

## Podcasts & Webinars

Nota Bene Episode 140: Navigating Troubled Company Acquisitions in the Wake of COVID-19 with Ori Katz (Summer Repeat)  
08.25.2021

Nota Bene Podcast Episode 132: 2021 Business Bankruptcy Trends with Ori Katz  
06.30.2021

## Practices

Bankruptcy and Restructuring

Bankruptcy Litigation

Commercial Lending and Financial Transactions

Commercial Mortgage Backed Securities ("CMBS")

Distressed Acquisitions Under Bankruptcy Code  
§ 363

Distressed Real Estate Loan Workouts and Enforcement

Municipal and Public Entity Restructuring

## Industries

Blockchain

Blockchain and Fintech

Financial Services

Fintech

## Education

J.D., Boston University, 2000, *magna cum laude*

B.A., University of California, Santa Barbara, 1996

## Clerkships

Extern to the Honorable Lynne Riddle, U.S. Bankruptcy Judge for the Central District of California

Extern to the Honorable William C. Hillman, U.S. Bankruptcy Judge for the District of Boston, Massachusetts

## Admissions

California

Federal Ninth Circuit Court of Appeals

Northern, Southern, Eastern and Central District Courts of California



## → William R. Wyatt

**Partner**

1540 El Camino Real  
Suite 120  
Menlo Park, CA 94025

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bwyatt@sheppardmullin.com

Bill Wyatt is a partner in the Finance and Bankruptcy and Corporate Practice Groups in the firm's Silicon Valley and San Francisco offices. He is also a member of the Asset-Based Lending Team.

**Areas of Practice**

Bill started as an associate at Sheppard Mullin in 1982 and became a partner in January 1990. He specializes in commercial law, real and personal property secured loan transactions, workouts and bankruptcy.

Bill has significant experience handling a broad range of financing transactions, including secured and unsecured credit facilities, bond and note financings, public finance transactions, letters of credit and other credit enhancements, derivative products, real property secured transactions, asset-based accounts, inventory and equipment financing transactions, equipment leasing transactions (including aircraft and rail) and project finance transactions. He has been involved in negotiating and documenting lines of credit secured by accounts, inventory, equipment and real estate, construction loans, and credit enhancements for tax-exempt bond and certificate of participation transactions. He also has experience with aircraft leasing and lending, ship financing, rail car and other types of equipment financing transactions, and has negotiated and documented both leveraged and non-leveraged leases of aircraft and rail equipment and manufacturing and medical facilities. Bill also regularly advises clients on swap and other derivatives transactions and related issues.

While his practice is focused primarily on transaction planning and documentation, he has substantial experience with loan workouts and the bankruptcy aspects of financial transactions. He has represented both institutional lenders, lessors and borrowers.

**Representative Transactions**

Represented domestic commercial bank in loan to aircraft lessor.

Representation of indenture trustee of certificate of participation issuance in Chapter 9 bankruptcy of the Richmond Unified School District

Representation of Wells Fargo Bank, Comerica Bank and Union Bank of California as issuers of direct-pay letters of credit to support variable rate bonds issued by the California Pollution Control Financing Authority

Representation of commercial finance company as purchaser of both taxable and tax-exempt bonds issued by the California State Community Development Authority and various city and county redevelopment authorities to finance various schools and healthcare facilities

Representation of Union Bank of California, as agent and lender in connection with a secured revolving mortgage warehouse facility to a leading housing tax credit syndicator

Representation of agent bank in connection with workout and restructure of a syndicated financing to a captive finance company making real estate secured development loans to national mini-storage developer

## Honors

Best Lawyer in America, Banking and Finance, *Best Lawyers*, 2018-2024

## Articles

### Corporate & Securities Law Blog Posts

- "Sheppard Submits Comments to Main Street Loan Program," April 17, 2020

## Media Mentions

Sheppard Mullin's Finance and Bankruptcy practice supports client's aggressive growth plan by streamlining process to remove manual work

*Office & Dragons*, 10.17.2022

Sheppard Mullin Represents Kratos Defense & Security Solutions Inc.

*San Diego Business Journal*, 05.26.2014

Sheppard Mullin Advises Kratos In \$625 Million Note Offering

*Daily Journal*, 05.13.2014

Sheppard Mullin Advises RadNet In Tender Offer

*Daily Journal*, 03.11.2014

## Events

MCLE Marathon 2023 with Elimination of Bias Credit

Sheppard Mullin Silicon Valley Office, 01.13.2023

The Next Four Years in Finance & Bankruptcy - The Road Ahead After the U.S. 2020 Election

Webinar, 12.08.2020

The Mortgage Banking Industry – 2019 in Review and A Look Ahead Webinar

02.04.2020

Breakfast With Your Finance & Bankruptcy Lawyers

Why The Boilerplate Is Important

Sheppard Mullin New York, 03.17.2016



Breakfast With Your Finance & Bankruptcy Lawyers  
Detroit and the Future of Municipal Bankruptcy: What We've Learned  
04.30.2015

Breakfast With Your Finance & Bankruptcy Lawyers  
Leverage Buyouts & Fraudulent Conveyances Risks  
07.23.2014

Roundtable With Your Finance & Bankruptcy Lawyers  
Intercreditor Agreements – What and How to Negotiate Them to Get What You Need  
05.22.2014

Breakfast With Your Finance & Bankruptcy Lawyers  
Municipal Bankruptcies - What To Learn From Detroit?  
Sheppard Mullin New York, 03.11.2014

Breakfast With Your Finance & Bankruptcy Lawyers  
Enforcement of Judgments - Between Contract Enforcement and Bankruptcy  
Sheppard Mullin New York, 10.31.2013

Breakfast With Your Finance & Bankruptcy Lawyers  
Real Estate Bankruptcy Issues: Cash Collateral, the Automatic Stay, Assignments of Rent, Lease Assumption and Rejection and Plan Issues  
Sheppard Mullin New York, 04.12.2013

Lunch With Your Finance & Bankruptcy Lawyers  
Real Estate Bankruptcy Issues: Cash Collateral, the Automatic Stay, Assignments of Rent, Lease Assumption and Rejection and Plan Issues  
Sheppard Mullin Washington, D.C., 04.08.2013

Breakfast With Your Finance & Bankruptcy Lawyers  
The Future Of Metavante And Its Impact On New Financings Supported by Hedges  
Sheppard Mullin New York, 01.16.2013

## Memberships

Member, Bar Association of San Francisco

Member, Corporation, Banking and Business Law and Real Property, Probate and Trust Law Sections, American Bar Association

Member, Financial Lawyer's Conference, Bankruptcy Study Group

## Podcasts & Webinars

MCLE Marathon 2023 with Elimination of Bias Credit  
01.13.2023

The Next Four Years in Finance & Bankruptcy  
12.08.2020

## Practices

Commercial Lending and Financial Transactions  
Real Estate, Energy, Land Use & Environmental  
Healthcare  
Bankruptcy and Restructuring  
Bankruptcy Litigation  
Derivatives and Structured Products  
Distressed Acquisitions Under Bankruptcy Code  
§ 363  
Distressed Real Estate Loan Workouts and Enforcement  
Real Estate Finance

## Industries

Aviation  
Blockchain  
Blockchain and Fintech  
Energy, Infrastructure and Project Finance  
Financial Services  
Fintech  
Healthcare

## Education

J.D., Stanford University, 1982  
M.S., Mechanical Engineering, Purdue University, 1979  
B.S., Mechanical Engineering, Purdue University, 1977, *with distinction*

## Admissions

California  
New York

## Additional Office

New York



## → Jason R. Schendel

**Partner**

1540 El Camino Real  
Suite 120  
Menlo Park, CA 94025

T: +1.650.815.2621

F: +1.650.815.2601

[jschendel@sheppardmullin.com](mailto:jschendel@sheppardmullin.com)

Jason Schendel is a partner in the Corporate Practice Group in the firm's Silicon Valley and San Francisco offices.

**Areas of Practice**

Jason's practice focuses on advising public and private companies in mergers & acquisitions, securities offerings (IPOs, SPAC IPOs, debt offerings, and the like), corporate governance, SEC reporting, and general corporate matters. Jason also has extensive experience working with private equity funds in connection with fund formation, general fund operating matters, and buy-side M&A for public companies and private sponsors.

Prior to joining Sheppard Mullin, Jason had been General Counsel of Entelos, Inc., a privately held life sciences company. Earlier in his career, Jason had practiced in the Silicon Valley offices of several major international law firms.

## Experience

**Recent Selected Transactions**

- Issuer in connection with proposed \$400 million SPAC initial public offering – expected to be filed confidentially with SEC in the second quarter of 2021
- Alpha Media in connection with \$115 million debtor-in-possession financing provided by Brigade Capital and ICG
- Issuer in connection with proposed \$300 million SPAC initial public offering – filed confidentially with SEC February 2021
- National Securities Corporation as placement agent in connection with private placement by Viewpoint Molecular Targeting, Inc.
- Tribe Capital Growth Corp. I (NASDAQ: ATVCU) in its \$276 million SPAC initial public offering
- Pay It Forward VC in connection with formation of the fund and numerous investments
- LKQ European Holdings B.V., a subsidiary of LKQ Corporation (NASDAQ: LKQ), €1 billion high-yield debt offering
- Intuitive Ventures in connection with numerous venture capital investments, including its Series A investment in KelaHealth, Inc.

- Varian Medical Systems Inc. (NASDAQ: VAR) in connection with its acquisition of CyberHeart
- River Islands Development in connection with multiple Rule 144A bond offerings
- Hecla Mining Company (NYSE: HL) public offering of \$475 million of senior debt securities
- El Centro Regional Medical Center \$125 million and \$50 million bond offerings
- Keefe, Bruyette & Woods, as representative of the underwriters, in connection with the initial public offering of OP Bancorp (NASDAQ: OPBK)
- Privately held media company in a proposed \$300 million high yield debt offering
- Raymond James, as representative of the underwriters, in connection with the public offering of common stock of FS Bancorp, Inc. (NASDAQ: FSBW)
- LendingTree, Inc. (NASDAQ: TREE) \$300 million convertible senior notes offering
- The Gymboree Corporation \$127.5 million sale of its Play & Music business to Zeavion
- LKQ Italia Bondco S.p.A., a subsidiary of LKQ Corporation (NASDAQ: LKQ), €500 million high-yield debt offering
- Diodes Incorporated (NASDAQ: DIOD) \$413 million acquisition of Pericom Semiconductor Corporation (NASDAQ: PSEM)
- LendingTree, Inc. (NASDAQ: TREE) \$112 million secondary public offering
- First Foundation (NASDAQ: FFWM) \$138 million initial public offering
- Dialogic Inc. (OTCB: DLGC) sale to NOVACAP
- dick clark productions joint venture with the Miss America Organization
- Sport Chalet, Inc. (NASDAQ: SPCH) sale to Vestis Retail Group LLC
- Kratos Defense & Security Solutions, Inc. (NASDAQ:KTOS) \$625 million high-yield debt offering
- Solid Concepts \$295 million sale to Stratasys Ltd. (NASDAQ: SSYS)
- RadNet, Inc. (NASDAQ: RDNT) tender offer for its \$200 million outstanding high-yield bonds
- LKQ Corporation (NASDAQ: LKQ) \$600 million high-yield debt offering
- Hecla Mining Company (NYSE: HL) \$500 million high-yield debt offering

## Articles

- "Chapter VI. (California)" Doing Business in States Other Than the State of Incorporation (Alabama Through Michigan)  
*84 C.P.S. (BNA), Bloomberg BNA's Corporate Practice Series, 2018*
- "Compliance and Oversight Issues: Unregistered Broker-Dealers and Finders," Understanding Legal Trends in the Private Equity and Venture Capital Market: Leading Lawyers on Navigating the Current Economy, Managing Risks, and Understanding Changing SEC Regulations (Inside the Minds)  
*Aspatore, 2014*
- JOBS Act Eases IPOs  
*The Recorder, 02.07.2013*
- SEC Leader Signals Revised Rules  
*The Recorder, 05.19.2011*

## Corporate & Securities Law Blog Posts

- "SEC Approves Updated Disclosure Requirements," August 21, 2018
- "SEC Approves Nasdaq's Proposed Rule on Third Party Payments to Directors and Director-Nominees – The 'Golden Leash' Disclosure," August 2, 2016
- "SEC Proposes Amendments to Update and Simplify Disclosure Requirements as Part of Overall Disclosure Effectiveness Review," July 22, 2016
- "SEC Staff To Express No Views On Conflicting Shareholder Proposals Under Rule 14a-8(i)(9)," January 29, 2015
- "NASDAQ Proposes The Adoption Of A New All-Inclusive Annual Listing Fee," September 9, 2014
- "Client Alert – Considerations for 2014 Proxy Season and Beyond," December 17, 2013
- "FTC Proposes Amendments To The Hart-Scott-Rodino Rules Regarding Withdrawal Of A Premerger Notification Filing," February 8, 2013
- "New IRS Regulations Regarding Noncompensatory Partnership Options Effective Immediately," February 7, 2013
- "FINRA Adopts Rule 5123 Requiring the Filing of Offering Documents used in Private Placements of Securities," January 24, 2013
- "Navigating the SEC's Recent Conflict Minerals Rules: Threading the Needle Through Complex Controls and Procedures and Complying with New Disclosure Requirements," September 21, 2012
- "Update on Timeline for SEC Rulemaking to Implement the JOBS Act and Dodd-Frank Act," July 25, 2012
- "President Obama Signs JOBS Act: Landmark Reform for Small and Emerging Growth Companies Now Law," April 5, 2012
- "Senate Passes Modified JOBS Act - Regulatory Reform for Small and Emerging Growth Companies Speeds Closer to Fruition," March 26, 2012
- "SEC Considering New Regulations Governing Capital Formation for Smaller Companies, Crowdfunding, Social and Other New Media," April 21, 2011
- "SEC's Proposed New Reporting Rules for Institutional Investment Managers," December 9, 2010

## Media Mentions

ZEAVION Holding's \$127.5 million acquisition of Gymboree Play & Music  
Don't Miss It: Hot Deals & Firms We're Following This Week  
*Law360*, 07.01.2016

Sheppard, O'Melveny Advise in \$91.4M Public Offering  
*Daily Journal*, 11.17.2015

Sheppard Mullin Represents Diodes in Its \$400 Million Acquisition of Pericom Semiconductor  
*Corporate Counsel*, 09.04.2015

Latham, Sheppard Mullin Steer \$400M Semiconductor Deal  
*Law360*, 09.03.2015

Sheppard Mullin, Manatt Advise in \$120 Million Public Offering  
*Daily Journal*, 08.11.2015

First Foundation, Advised by Sheppard Mullin Attorneys, Announces Pricing and Upsizing of Common Stock Offering  
*Metropolitan Corporate Counsel*, 08.07.2015

Sheppard Mullin Helps Medical Center With Bond Offering  
*Daily Journal*, 03.24.2015

Novacap to Acquire Dialogic  
*The Deal Pipeline*, 10.13.2014

Sheppard Mullin Advises Sporting Goods Retailer in Private Equity Sale  
*Daily Journal*, 07.08.2014

Sheppard Mullin Represents Kratos Defense & Security Solutions Inc.  
*San Diego Business Journal*, 05.26.2014

Sheppard Mullin Advises Kratos In \$625 Million Note Offering  
*Daily Journal*, 05.13.2014

Stratasys Buys 2 US 3D Printing Cos.  
*Law360*, 04.02.2014

Sheppard Mullin Advises RadNet In Tender Offer  
*Daily Journal*, 03.11.2014

## Practices

Corporate  
Capital Markets  
Private Equity  
Public Company Corporate Governance and Compliance

## Industries

Emerging Company & Venture Capital  
Entertainment, Technology and Advertising  
Esports & Games  
Financial Services  
Investment Management  
Life Sciences  
Private Equity

## Education

J.D., Columbia Law School, 2002, Harlan Fiske Stone Scholar

B.S.B., University of Minnesota, 1996, Evans Scholar, Dean's List

## Admissions

California

## Additional Office

San Francisco

## Languages

Chinese (Mandarin)



## → Michael M. Lauter

### Partner

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Seventeenth Floor  
San Francisco, CA 94111

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Michael Lauter is a partner in the Finance and Bankruptcy Practice Group in the firm's San Francisco Office.

### Areas of Practice

Mick Lauter has a broad based practice representing lenders, debtors, committees, creditors, asset purchasers, plan funders, receivers, plan administrators, trustees, assignees, and other parties in front end loan originations, loan workouts and restructurings, federal and state law creditor's rights actions, and chapter 11 debtor and committee cases. Mick's deep understanding of both front end finance and bankruptcy and restructuring allows him to help best position clients for a successful result in any economic cycle.

## Honors

Best Lawyers in America, *Best Lawyers*, 2018-2024

Northern California Super Lawyer, *Super Lawyer*, 2020-2023

Northern California Rising Star, *Super Lawyers*, 2013-2019

Corporate Restructuring, *Legal 500*, 2013, 2015

## Experience

### Front End Finance

- Represented lender in nine figure marketable stock secured loan.
- Represented lender in loan to finance a seed fund for start up portfolio companies.
- Represented lender in nine figure loan secured by apartment buildings in California.
- Represented lender in nine figure loan secured by shopping centers in Arizona.
- Represented lender in numerous real estate secured loans in and out of California.
- Represented lender in numerous unsecured bridge loans and cash-out refinances.

### Agricultural Finance

- Represented national lender in real estate secured term loan and operating line of credit to almond processor.



- Represented national lender in connection with a series of real estate and personal property secured loans to almond grower.
- Represented national lender in connection with crop line of credit to pistachio grower.
- Represented national lender in restructuring of related loans to grower and processor.

## **Chapter 11 Debtor**

- Represented toy company debtor through chapter 11 sale process in In re Imperial Toy LLC, Bankr. N.D. Cal.
- Represented waterpark debtor in chapter 11 restructuring in In re Rexford Properties LLC, Bankr. C.D. Cal.
- Represented furniture company debtor in chapter 11 liquidation in In re Easy Life Furniture, Bankr. C.D. Cal.
- Represented biotech debtor in chapter 11 restructuring in In re Arriva Pharmaceuticals, Inc., Bankr. N.D. Cal.
- Represented creamery debtor in chapter 11 sale and restructuring in In re Humboldt Creamery, LLC, Bankr. N. D. Cal.
- Advised various debtors and potential debtors in out of court restructurings.

## **Chapter 11 Creditors Committee**

- Committee counsel in law firm bankruptcy in In re Sedgwick, LLP, Bankr. N.D. Cal.
- Committee counsel in steel foundry bankruptcy in In re Pacific Steel Casting Company, Bankr. N.D. Cal.
- Committee counsel in asbestos bankruptcy in In re Plant Insulation Company, Bankr. N.D. Cal.
- Committee counsel in bankruptcy of financier convicted of securities fraud in In re Del Biaggio, Bankr. N.D. Cal.

## **Receivers, Trustees, Plan Administrators, Assignees, and other Fiduciaries**

- Represented plan administrator in confirmed chapter 11 case in Oakland.
- Represented receiver appointed by an Austrian court in the liquidation of a solar company in litigation in federal district court in San Francisco.
- Represented federal court receiver appointed by U.S. District Court of the Virgin Islands in various related bankruptcy cases in Southern California.
- Represented assignee in the sale of the intellectual property of a defunct tech company with a presence in the U.S. and Canada.
- Represented state court receiver in the marketing and sale of a bed and breakfast in Napa.
- Represented a state court receiver in the partial completion and unit-by-unit sale of a residential subdivision in King City, CA.

## **Secured Lender Creditor's Rights Enforcement Actions**

- Represented secured lender in connection with two related financings to entities in the aggregate amount of over \$500 million secured by public company stock, and guaranteed by a series of entities and irrevocable trusts, which trusts had governing documents dating back to the 1940s.
- Represented the primary secured lender in the chapter 7 bankruptcy of Golden Gate Community Health, f/k/a Planned Parenthood Golden Gate.

- Represented secured lender in obtaining state court judgment and non-dischargeable judgment and confirming a creditor's plan in bankruptcy of a guarantor in a winery-related case in Northern California.
- Represented secured lender in appointing receiver over residential project in Sonoma County.
- Represented secured lender in the workout of a mobile home timeshare resort in Northern California.
- Represented secured lender in the appointment of a receiver who marketed and facilitated the sale of a 129 unit condominium complex in Roseville, CA.
- Represented secured lender in the workout of a series of long-defaulted loans with mixed collateral in multiple states.

## **Representation of Asset Purchasers, Plan Funders, and Other Strategic Investors**

- Represented plan funder in chapter 11 bankruptcy case involving Silicon Valley real estate development.
- Represented plan funder in chapter 11 bankruptcy case involving high tech IP assets.
- Represented purchaser of special servicing rights out of bankruptcy in workout of acquired loans.

## **Creditor Representations**

- Represented various buyers and sellers of proofs of claim in multiple chapter 11 cases.
- Local counsel to group of unsecured lenders in PG&E bankruptcy case.
- Represented various trade creditors in protecting interests and becoming critical vendors in various chapter 11 cases.
- Represented film distribution companies in assignment and assumption issues in Weinstein Company bankruptcy.

## **Articles**

- Diamond Sports Illustrates Evolving Issues of Bankruptcy Law & Sports Broadcasting Rights  
*Bloomberg Law*, 05.08.2023
- "Prying Jurisdiction Away From Bankruptcy Courts," *Law360*, June 28, 2011

## **Finance & Bankruptcy Law Blog Posts**

- "Double Whammy: In a Sweeping New Opinion, the Ninth Circuit Creates a New Mechanism for Completely Wiping Out Unexpired Leases in Bankruptcy, and Also Undercuts a Critical Protection for Buyers in 363 Sales," October 5, 2017
- "The Structure of Dismissals – Supreme Court's Jevic Decision Lays Out Ground Rules for Parties Seeking to Resolve Bankruptcies Through the Increasingly Popular Method of Structured Dismissals," March 29, 2017
- "Claims Trading From The Inside Out: Ninth Circuit BAP Holds That A Non-Insider Claimant's Vote On A Plan Is Not Discounted Merely Because The Claimant Purchased Its Claim From An Insider," April 18, 2013
- "Canonized Credit-Bidding: The Supreme Court Unanimously Affirms Secured Creditor's Right to Credit-Bid at Free and Clear Sale in Plan," June 8, 2012

## Media Mentions

Imperial Toy Plans Sale to Ja-Ru  
*The Deal*, 11.19.2019

Easy Life Furniture to liquidate in Chapter 11  
*The Deal Pipeline*, 05.02.2014

## Memberships

Conference Co-Chair, California Bankruptcy Forum (2017)

Education Co-Chair, California Bankruptcy Forum (2015, 2016)

Program Book Chair, California Bankruptcy Forum (2012)

Session Producer, California Bankruptcy Forum (2011, 2013)

Member, Bench-Bar Liaison Committee for the United States Bankruptcy Court, Northern District of California (2014 – 2018)

Co-Chair, Bench-Bar Liaison Committee for the United States Bankruptcy Court, Northern District of California (2015 – 2016)

Conference Chair of the Bay Area Bankruptcy Judges' Conference (2017)

Member, Insolvency Law Committee of the California State Bar Association (2015 – 2018)

Board Member, Bay Area Chapter of the California Receiver's Forum (2013 – Present)

President, Bay Area Chapter of the California Receiver's Forum (2016, 2017)

## Practices

Commercial Mortgage Backed Securities ("CMBS")

Asset Based Lending

Bankruptcy and Restructuring

Bankruptcy Litigation

Commercial Lending and Financial Transactions

Debtor in Possession (DIP) Financing

Distressed Acquisitions Under Bankruptcy Code  
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Distressed Real Estate Loan Workouts and Enforcement

Municipal and Public Entity Restructuring

## Industries

Artificial Intelligence

Food and Beverage

Sports

## Education

J.D., University of Chicago Law School, 2006

B.A., University of California, Berkeley, 2001, *Phi Beta Kappa, departmental highest honors*

## Admissions

California

United States District Court for the Northern, Southern, Central, and Eastern Districts of California

United States Court of Appeals for the Ninth Circuit



## → Johneth Chongseo Park

### Partner

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Johneth Park is a partner and foreign legal consultant in the Corporate Practice Group and Office Managing Partner of the firm's Seoul office.

### Areas of Practice

Johneth's primary areas of concentration include capital markets, mergers and acquisitions and private equity transactions. He has extensive experience representing corporate, financial and government-affiliated clients in Korea-related work as well as work in other jurisdictions.

Johneth has worked on securities offerings by a wide range of Korean issuers, including The Republic of Korea, The Export-Import Bank of Korea, Korea Electric Power Corporation, Korea Hydro-Nuclear Power, Korea Western Power, Korea Midland Power, Korea East-West Power, Korea South-East Power, Korea Gas Corporation, Korea Expressway Corporation, Korea Land Corporation, Cheil Industries, Samsung Life Insurance, Shinhan Financial Group, Shinhan Bank, Hyundai Motors, Hyundai Capital Services, Hyundai Card, POSCO, POSCO Engineering & Construction, POSCO Specialty Steel, STX, SK Telecom, GRAVITY, WiderThan, and C&M, among others, and periodic SEC reporting by KEPCO and Shinhan Financial Group.

Johneth has also worked on a number of M&A and private equity transactions, including the sale of a controlling stake in a Singapore-listed subsidiary by STX Offshore & Shipbuilding, investments by Goldman Sachs PIA in a number of Korean companies, investments by Citadel in a number of PRC-based companies, joint ventures involving LG Display, private equity investments into Yingli Green Energy, acquisition of MSK Corporation by Suntech, acquisition financing involving Citi and C&M, the acquisition of Andover Bancorp by Banknorth Group, and acquisitions of brokerage firm by Boston Financial Holdings, among others.

Johneth has also worked as General Counsel for Doosan Corporation and Chief Legal Officer for HyAxiom, Inc. a US-based subsidiary of Doosan Corporation.

### Honors

Recognized Practitioner for South Korea, Capital Markets: International Firms, *Chambers Global*, 2016, 2017, 2018

Recommended by The Legal 500 Asia Pacific 2016 - Foreign firms, 2016

## Experience

- Represented **Doosan Corporation and its various subsidiaries** on a number of corporate, IP and other transactions
- Represented **Goldman Sachs PIA** with respect to its various investments in Korea-based companies
- Represented **Citadel** with respect to its various alternative investments in PRC-based companies, including American Dairy, China Securities & Surveillance Technology, Fushi International and Harbin Electric
- Represented **STX Offshore & Shipbuilding** and its subsidiaries in the sale of a controlling stake in STX OSV Holdings, a Singapore-listed offshore specialty vehicle manufacturer based in Norway, to an affiliate of Fincantieri-Cantieri Navali Italiani
- Represented KDB Daewoo Securities, Citi and JP Morgan, among others, in the initial public offering in Korea of **Cheil Industries**, the flagship member of the Samsung Group
- Represented BofA Merrill Lynch, Citi, Goldman Sachs and other international underwriters in the initial public offering of **Samsung Life Insurance**, a leading life insurer in Korea and a key member of the Samsung Group
- Represented KDB Daewoo Securities and Citi in the initial public offering of **Hi-mart** (renamed Lotte Hi-mart), a leading electronics goods retailer in Korea
- Represented Credit Suisse in the SEC-registered offering of US\$200 million floating rates notes by **The Export-Import Bank of Korea**
- Represented **Shinhan Financial Group** in its rights offering and in the filing of annual and other reports with the SEC
- Represented **Shinhan Bank** in the establishment of a global medium term notes program and acted as the sole international counsel in the general updates of the global medium term notes program and the issuances of various notes thereunder in reliance on Rule 144A and Regulation S
- Acted as the sole international counsel in the establishment of the global medium term notes program for **Korea Electric Power Corporation (KEPCO)**, a government-controlled electricity provider in Korea and the issuances of various notes thereunder in reliance on Rule 144A and/or Regulation S; also represented KEPCO in the filing of annual and other reports with the SEC
- Acted as the sole international counsel in the offerings of various notes by **Korea Hydro-Nuclear Power, Korea Western Power, Korea East-West Power and Korea Midland Power**, each an electricity generation company and subsidiary of KEPCO, in reliance on Rule 144A and/or Regulation S
- Acted as the sole international counsel in the establishment of the global medium term notes program for **Korea Land & Housing Corporation**, a government-controlled entity charged with carrying out the government's land and housing policies, and the issuance of notes thereunder in reliance on Rule 144A and Regulation S
- Acted as the sole international counsel in the general updates of the global medium term notes program for **Korea Expressway Corporation**, a government-controlled operator of national highways, and the issuances of notes thereunder in reliance on Rule 144A and Regulation S
- Represented various underwriters in the general updates of the global medium term notes program for **Korea Gas Corporation**, a government-controlled distributor of liquefied natural gas, and the issuances of various notes thereunder in reliance on Rule 144A and/or Regulation S
- Acted as the sole international counsel in the offerings of various guaranteed notes for subsidiaries of **Hyundai Motor Company**, a leading global auto manufacturer based in Korea, in reliance on Rule 144A and

## Regulation S

- Represented **Hyundai Capital Services**, the auto financing arm of the Hyundai Motor group, in the establishment of a global medium term notes program and acted as the sole international counsel in the general updates of the global medium term notes program and the issuances of various notes thereunder in reliance on Rule 144A and Regulation S
- Represented **Hyundai Card**, a leading credit card service provider in Korea, in the offerings of various notes in reliance on Rule 144A and Regulation S
- Represented various underwriters in the offerings by **POSCO**, a leading global steel manufacturer based in Korea, of various senior notes and exchangeable notes
- Represented various underwriters in the proposed initial public offering by **POSCO Engineering & Construction**
- Represented **C&M**, a cable service provider in Korea, in a high-yield notes offering
- Represented **Yingli Green Energy**, a leading solar energy company based in China, in its initial public offering for the listing on the New York Stock Exchange as well as its Series A, Series B and other pre-IPO financings
- Represented **WiderThan**, a ringtone servicer affiliate of SK Telecom, the leading telecommunications service provider in Korea, in its initial public offering for the listing on NASDAQ
- Represented **Gravity**, an online game company based in Korea, in its initial public offering for the listing on NASDAQ

## Media Mentions

2023 Law Firms in Korea: Sheppard Mullin  
*Legal Times*, 11.21.2023

## Practices

Corporate

Capital Markets

Mergers and Acquisitions

Emerging Company & Venture Capital

Energy, Infrastructure and Project Finance

International Reach

Korea

## Education

J.D., Georgetown University Law Center, 2000, *Georgetown Immigration Law Journal*

M.A., Columbia University, 1995

B.A., Harvard University, 1991, *cum laude*

## Admissions

New York

Massachusetts

Republic of Korea (Foreign Legal Consultant for U.S. Law)

## Languages

English

Korean





## → Amanda L. Cottrell

### Partner

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Amanda Cottrell is a partner in the Business Trial Practice Group in the firm's Dallas office.

### Overview

An aggressive trial lawyer, Amanda is a problem solver who helps individuals and companies protect their money and property in high-stakes litigation. While the subject matter of her practice can vary depending on a client's needs, there is always a common thread: strategic lawyering and successful results.

In the past 15 years, Amanda's complex deal litigation has covered a wide array of disputes. She has helped business leaders successfully navigate high stress situations usually arising from contracts, company break ups, and acquisitions – such as purchase price and working capital adjustments, business performance and earn-out disputes, breaches of contract terms, representations and warranties, or fiduciary and fraud claims. With representations spanning many industries, Amanda has honed her expertise primarily in the areas of real estate, oil and gas, healthcare, commercial contracts, insurance, and telecommunications.

Getting her start as a commercial real estate attorney, Amanda is considered a go-to real estate litigator by her peers and clients. She routinely represents data centers, real estate investors, banks, and special servicers in commercial disputes. Based in Texas, Amanda also has substantial experience in upstream oil and gas litigation. She has represented major oil and gas companies, independents, and landowners in disputes over mineral title ownership, operating agreements, surface use and damages, pooling, lease covenants, royalties, post-production processing costs, and co-tenancy accounting.

Amanda's clients and colleagues appreciate her attention to detail, hard work ethic and good judgment – and she is often brought in by her colleagues to either be the lead litigator on multidisciplinary teams or local counsel in Texas. Amanda supports the firm's restructuring practice, providing strategic counsel in contested matters filed in bankruptcy courts from coast to coast. She also partners with Sheppard Mullin's White Collar Defense and Corporate Investigation team with a focus on healthcare industry clients in fraud, false claims, and kickback matters being investigated or prosecuted by state and federal agencies.

Prior to joining Sheppard Mullin, Amanda spent nine years working with a team led by a former U.S. Attorney for the Northern District of Texas and an additional 20 months as a leader on a court-appointed compliance monitor team for a large international technology company.

Amanda is an avid distance runner, earning two varsity letters in cross country and track at Vanderbilt University. Her endurance and mental tenacity shine through in her law practice. Amanda's efforts have been recognized by colleagues and peers in a variety of legal publications, including *Best Lawyers*, *Super Lawyers*,

*Thomson Reuters and D Magazine.*

For the past three years, Amanda has served as Co-Chair of the North Texas Food Bank's *Partners 4 Hope Campaign* that has provided over one million nutritious meals to local families.

## Honors

Best Lawyers in America, *Best Lawyers*, 2024

Best Lawyers in Dallas, *D Magazine*, 2022

Texas Top Women - Rising Stars, *Super Lawyers*, 2022

Texas Rising Star, *Super Lawyers*, 2016-2022

Best Lawyers Under 40, *D Magazine*, 2019-2021

Dallas Bar Association WE LEAD Class of 2019

## Articles

- A Journey of Gratitude and Friendship: An Interview with Frank Stevenson  
*The Texas Lawbook*, 02.14.2024
- Zoomed to Perfection: Lawsuits Settled, Pajamas Approved  
*Headnotes Dallas Bar Association*, February 2024
- How SCOTUS 'Shook the Rails' on State Court Jurisdiction  
*The Texas Lawbook*, 07.12.2023
- Justices' Jurisdiction Ruling Could Increase Business Liability  
*Law360*, 06.02.2022

## Corporate & Securities Law Blog Posts

- "Texas Revolution: State Legislature Creates New Business Court System to Handle Significant Commercial Disputes," July 28, 2023

## Media Mentions

Law360's 2023 Texas Editorial Advisory Board  
*Law360*, 08.30.2023

Donor Spot  
*North Texas Food Bank Blog*, 03.28.2022

Alpha Media Hits Ch. 11 To Beat COVID-19 'Headwinds'  
*Law360*, 01.25.2021

Sheppard Mullin Adds Dallas Litigation Partner  
*The Texas Lawbook*, 05.13.2019

## Events

Do We Still Have A Deal? An Overview of Force Majeure and “Impossibility” In Texas Contracts Webinar, 03.26.2020

## Memberships

Secretary, Dallas Chapter, Women in White Collar Defense Association

Member, Oil, Gas & Energy Resources Law Section, State Bar of Texas

At-Large Director of the Dallas Bar Association’s Board of Director’s 2024-2026

Member, Energy Section, Dallas Bar Association

## Podcasts & Webinars

Do We Still Have A Deal? An Overview of Force Majeure and “Impossibility” In Texas Contracts 03.26.2020

## Practices

Litigation

Bankruptcy Litigation

White Collar Defense and Corporate Investigations

Real Estate, Energy, Land Use & Environmental

Land Use Litigation

Bankruptcy and Restructuring

Construction

Distressed Real Estate Loan Workouts and Enforcement

## Industries

Energy, Infrastructure and Project Finance

## Education

J.D., Southern Methodist University, 2008, *magna cum laude*, *Order of the Coif*

B.A., Vanderbilt University, 2005, *summa cum laude*

## Admissions

Texas

U.S. District Courts for the Northern, Eastern, Southern and Western Districts of Texas



## → Jeannie Kim

### Associate

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Jeannie Kim is an associate in the Finance and Bankruptcy Practice Group in the firm's San Francisco office.

### Areas of Practice

Jeannie represents corporate debtors-in-possession, official committees of unsecured creditors, chapter 11 trustees, asset purchasers, and individual creditors in all aspects of complex chapter 11 cases, related litigation, state and federal receivership cases, state insolvency proceedings, and out-of-court workouts. She has also represented financial institutions, technology companies, commercial landlords, and vendors as secured creditors, contract counterparties, and administrative creditors in insolvency proceedings. Jeannie has also provided general legal counsel to commercial clients in a range of industries including technology, commercial leasing, entertainment, retail, hospitality, manufacturing and distribution, consumer products, alternative energy, mining, aviation, and real estate development.

### Honors

- Super Lawyers Northern Calif. "Rising Star" (2018 - 2020); Southern Calif. "Rising Star" (2013 - 2016)
- "Best Lawyers Under 40," National Asian Pacific American Bar Association (2018)
- "40 Under 40" Inaugural Class, American Bankruptcy Institute (2017)
- Rising Star Semi-Finalist, International Women's Insolvency and Restructuring Confederation (2017)

### Articles

- Hearts Are Still in San Francisco—The Bay Area's Case for a Comeback  
*Journal of Corporate Renewal*, 10.04.2023
- Guest Editor  
*Journal of Corporate Renewal*, the member magazine for the Turnaround Management Association, January 2020, July/August 2019
- Protecting Exclusive Distribution Rights for Patented Products and Other Licensed IP  
*The Licensing Journal*, Volume 40 number 10, November/December 2020
- Protecting Exclusive Distribution Rights for Patented Products and Other Licensed IP  
*Journal of Corporate Renewal*, July/August 2020

## Speaking Engagements

- American Bankruptcy Institute, Southwest Bankruptcy Conference, ABITalks Speaker, *Climate Change, Tourism, and Chapter 11: A Case Study of In re Redwood Empire Lodging, L.P.* (September 2022)
- American Bankruptcy Institute, Annual Spring Meeting, Panelist, *Reconsidering Value Allocation: Tools for Junior Stakeholders* (April 2022)
- American Bankruptcy Institute, Southwest Bankruptcy Conference, Panelist, *First Look at Small Business Reorganization Act Cases* (August 2021)
- Bar Association of San Francisco, Panelist, *Walks, Talks, and Smells Like Fraud: Ponzi Schemes in Bankruptcy* (September 2020)
- Bar Association of San Francisco, Commercial Law and Bankruptcy Section, Panelist, *Cannabis and Bankruptcy: The Hazy State of the Law* (July 2019)
- Association of Insolvency and Restructuring Advisors, Annual Bankruptcy & Restructuring Conference, Panelist, *Financial Toolbox* (June 2019, 2018, 2017, and 2016)
- American Bankruptcy Institute, Annual Winter Leadership Conference, *Should We File It Here or There? Venue Options in Cross-Border Cases* (December 2018)
- Bay Area Bankruptcy Forum, Judges' Night, *The Problems with Cannabis Cases* (September 2018)
- National Conference of Bankruptcy Judges 91<sup>st</sup> Annual Conference, Contestant, *'Fish Tank' Live at the Paris Hotel – Will the Shooter be Able to Sell Its Assets Without Successor Liability?* (October 2017)
- International Association of Korean Lawyers, 25<sup>th</sup> Annual Conference, Panelist, *New Kid on the Block* [Comparative review of specialized courts to adjudicate insolvency and restructuring proceedings in the U.S, South Korea, and Europe] (September 2017)
- National Asian Pacific American Bar Association, 26<sup>th</sup> Annual Conference, Moderator, *Where's the Money? Recovering Hidden Assets – International Judgment Enforcement* (November 2014)
- National Asian Pacific American Bar Association, 25<sup>th</sup> Annual Conference, Panelist, *Silver Linings Playbook: Playing Smart to Achieve Success* (November 2013)

## Events

Trending Legal Issues in the Retail Industry  
Webinar, 06.16.2020

## Memberships

- Committee Member and Panelist, Roadways to the Bench, United States Bankruptcy Court for the Northern District of California, (April 2023)
- Co-Chair, Bench-Bar Liaison Committee for the United States Bankruptcy Court for the Northern District of California (2022 - 2023); Member (2020 - 2022)
- Turnaround Management Association (2017 - Present); Network of Women Chair, Northern California Chapter (2020 – 2023); *Journal of Corporate Renewal* Editorial Advisory Board (2019 - 2020)

- American Bankruptcy Institute (2010 - Present); Annual Southwest Bankruptcy Conference, Sponsorship Co-Chair (2022-2023); Advisory Board Member (2019 - 2023)
- Bar Association of San Francisco, Commercial Law and Bankruptcy Section, Vice Chair (2023); Treasurer (2022); Secretary (2021); Executive Committee Member (2019 - 2020)
- California Bankruptcy Forum - Bay Area, Orange County, or Los Angeles Forum Member (2010 - Present); Bay Area Bankruptcy Forum, Treasurer (2022 - 2023); Programming Committee Co-Chair (2020 – 2023); At-Large Director (2019 - 2021); General Education Co-Chair (34<sup>th</sup> Annual Insolvency Conference); Panel Co-Producer, General Session Education Program (32<sup>nd</sup> Annual Insolvency Conference); Young Insolvency Professionals Program Co-Chair (29<sup>th</sup> and 33<sup>rd</sup> Annual Insolvency Conference); Panel Co-Producer, Young Insolvency Professionals Program (28<sup>th</sup> and 27<sup>th</sup> Annual Insolvency Conferences)
- International Women's Insolvency and Restructuring Confederation (2010 - Present); Northern California Network Events Co-Chair (2016 - 2018)
- National Conference of Bankruptcy Judges, 2018 Education Committee (October 2018)
- Orange County Bar Association, Appointments Committee Member (2018)
- Orange County Asian American Bar Association (2011 - Present); 25<sup>th</sup> President (2018 - 2019); President-Elect (2017- 2018); Treasurer (2016 - 2017); Secretary (2015 - 2016); Director (2013 - 2015)
- National Asian Pacific American Bar Association, Direct/Affiliate Member (2009 - Present); Bankruptcy, Restructuring and Creditors'/Debtors' Rights Committee Co-Chair (2014- 2018)
- Collaborative Bar Leadership Academy (American Bar Association), Inaugural Class Member (2013); NAPABA Alumni Committee Representative (2014)
- University of California, Irvine – School of Law Domestic Violence Clinic, Attorney Supervisor (2014)

## Podcasts & Webinars

Trending Legal Issues in the Retail Industry  
06.16.2020

## Practices

Bankruptcy and Restructuring

Bankruptcy Litigation

Distressed Acquisitions Under Bankruptcy Code  
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## Industries

Financial Services

## Education

J.D. Loyola Law School, Los Angeles, 2009, Dean's Scholar (2005 - 2006)

Postgraduate Diploma, University of St. Andrews, 2006

B.A., University of California, Los Angeles, 2002, Phi Alpha Theta History Honor Society, UCLA President's Washington Scholarship for Public Policy Research

## Clerkships

*Judicial Law Clerk to the Honorable Alan Jaroslovsky, U.S. Bankruptcy Court, Northern District of California.*

*Judicial Law Clerk to the Honorable Thomas E. Carlson (Recalled Judge), U.S. Bankruptcy Court, Northern District of California .*

*Judicial Law Clerk to the Honorable Deborah J. Saltzman, U.S. Bankruptcy Court, Central District of California.*

## Admissions

California

Federal Ninth Circuit Court of Appeals

Northern, Southern, Eastern and Central District Courts of California



## → Steven G. Gersten

### **Associate**

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Steven Gersten is an associate in the Business Trial Practice Group in the firm's Dallas office.

### **Overview**

Steven solves clients' problems by quickly mastering the facts and the law and weaving them together to develop big-picture strategies and compelling presentations to achieve client-focused wins. He keeps an active trial practice, representing parties in complex business litigation in state, federal, and bankruptcy courts, arbitrations, and white collar defense and investigations.

Steven graduated *magna cum laude* from Washington University in St. Louis School, where he externed for the Honorable Raymond W. Gruender of the United States Court of Appeals for the Eighth Circuit, served as a Senior Staff Editor on the Washington University Law Review, was a two-time member of the National Moot Court team, and received the Judge Amandus Brackman Moot Court Award.

### ***Bankruptcy Litigation***

As a member of the firm's Bankruptcy Litigation practice, Steven advises debtors, creditors, and liquidating trustees on contested matters in complex Chapter 11 and Chapter 7 cases. He was a key member of the litigation teams in the Seadrill Partners LLC and Alpha Media cases, the latter of which was recognized as the Turnaround Management Association's "Large Company Turnaround of the Year" in 2021, and played key roles in successfully suing the Small Business Administration to enable multiple clients to obtain Payment Protection Plan loans despite still being in bankruptcy.

### ***Complex Commercial Litigation***

A true generalist, Steven represents clients big and small embroiled in high-stakes business litigation in state and federal courts, as well as arbitration. His clients span a range of industries, including telecom, transportation, aerospace and defense, software development, and healthcare, and he routinely represents them in matters involving complex contractual disputes, securities fraud, partnership disputes, trade secrets, restrictive covenant litigation, and defamation. Steven also regularly represents commercial real estate clients, including companies, banks, private lenders, and special servicers, in commercial disputes involving land use issues, contractual covenants, financial instruments, and commercial loan enforcement.

Steven's experience covers the entire litigation process, from pre-suit through trial or settlement, including significant wins for clients seeking or facing emergency injunctive relief. Steven's substantial experience with document collection and electronic discovery across a wide array of clients allows him to help clients navigate



the oft-burdensome discovery process as efficiently as possible, helping to minimize discovery-related litigation costs and business interruptions. In all cases, Steven channels his competitive nature to quickly become an expert on his clients' businesses and the legal matters at hand, while leveraging his experience and mastery of details to spot legal issues and formulate big picture strategies tailored to each clients' unique needs.

## ***White Collar Criminal Defense and Investigations***

In addition to his active litigation docket—and, at time, in tandem with it—Steven represents clients in civil and criminal matters prosecuted by federal and state agencies, with an emphasis on matters involving the False Claims Act. For the first few years of his career, Steven worked with a team led by a former U.S. Attorney for the Northern District of Texas and represented companies and individuals involved in DOJ and SEC investigations. Later, he served as a key team member for the court-appointed compliance monitor of a Chinese telecom company, where he led teams of lawyers and consultants conducting audits with a focus on international export controls and trade regulations administered by BIS and OFAC.

In connection with this work, Steven has become a seasoned investigator, with substantial experience managing and participating in multinational investigations with sensitive timelines and deliverables, many of which implicated potential liabilities in the tens- if not hundreds-of-millions of dollars. He has conducted thousands of witness interview, authored investigation reports, and advised general counsels and special board committees on an array of legal issues, including fraud allegations, false statements, corporate ethics issues, securities violations, and disclosure obligations.

## Honors

'Large Company Turnaround of the Year Award' for service as lead restructuring counsel to Alpha Media, *Turnaround Management Association's Chicago/Midwest Chapter*, 2021

## Articles

### **Finance and Bankruptcy Law Blog Posts**

- "A Bankruptcy Conundrum: When You Must Seek Relief To Seek Relief," June 28, 2021

## Practices

Litigation

Bankruptcy Litigation

Distressed Real Estate Loan Workouts and Enforcement

## Education

J.D., Washington University School of Law, 2013, *magna cum laude*

B.A., Queens College, City University of New York, 2010 *cum laude*, *High Honors* in Psychology

## Clerkships

Extern to the Honorable Raymond W. Gruender of the United States Court of Appeals for the Eighth Circuit.

## Admissions

Texas

U.S. District Court for the Northern District of Texas



## → Gianna Segretti

### Associate

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Gianna Segretti is an associate in the Finance and Bankruptcy Practice Group in the firm's Orange County office.

### Areas of Practice

Gianna practices in the areas of bankruptcy law and commercial litigation. She has experience representing creditors in bankruptcy litigation and proceedings as well as experience representing plaintiffs and defendants in disputes in state and federal court, including claims involving breach of contract, real property, unfair business practices, business torts, and federal banking laws and regulations.

### Media Mentions

Meet the Sheppard Mullin Litigator Facing Off with California Police Unions Over Misconduct Records  
*The American Lawyer*, 08.03.2020

### Practices

Bankruptcy and Restructuring

Bankruptcy Litigation

Distressed Acquisitions Under Bankruptcy Code  
§ 363

### Education

J.D., Santa Clara University, 2018, *cum laude*, *Order of the Coif*

B.A., University of California, Berkeley, 2006

### Admissions

California

Northern, Southern, Eastern and Central District Courts of California



## → Koray Erbası

### **Associate**

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Koray Erbası is an associate in the Finance and Bankruptcy Practice Group in the firm's San Francisco office.

## Practices

Bankruptcy and Restructuring

## Education

J.D., University of California, Los Angeles, 2020

## Admissions

California



## → Scott Natsuhara

### Associate

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Scott Natsuhara is an associate in the Finance and Bankruptcy Practice Group in the firm's Los Angeles office.

### Areas of Practice

Before law school and joining Sheppard Mullin, Scott worked for Bank of America and Banc of California as a Business Banking Relationship Manager and Business Development Officer that focused on originating commercial loans.

### Articles

- "Will the Consumer Financial Protection Bureau Start Regulating Commercial Lending to Small Business? A brief analysis of the current state of commercial regulation and evaluating its future," USC Gould's Business Law Digest, January 9, 2021

### Consumer Finance and Fintech Blog

- "New CFPB Circular: Reopening Closed Accounts May Violate CFPA," May 26, 2023
- "Washington State Enacts Credit Repair Law," May 12, 2023
- "CFPB: TILA Does Not Preempt State Commercial Financial Disclosures," April 10, 2023

### Practices

Bankruptcy and Restructuring

Commercial Lending and Financial Transactions

Corporate

Distressed Real Estate Loan Workouts and Enforcement

### Education

J.D., University of Southern California, 2022

B.A., University of California, San Diego, 2012

### Admissions

California



## → Matt Benz

### Associate

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Matt Benz is an associate in the Finance and Bankruptcy Practice Group in the firm's Chicago office.

### Areas of Practice

Matt concentrates his practice on both debtor and creditor representations in all aspects of corporate restructuring, bankruptcy and financial distress.

### Articles

- Eye on Privacy: 2023 Year in Review  
01.26.2024
- Regulators' Focus On AI Highlights Risks For Lenders  
*Law360*, 10.16.2023
- How Fed's Crypto Denial Fits Into Broad Regulatory Movement  
*Law360*, 03.06.2023

### Consumer Finance and Fintech Blog Posts

- "FTC Announces Settlement of Junk Fee Enforcement Action," February 9, 2024
- "CFPB Continues Focus on Credit Reporting with Guidance on FCRA Compliance," January 26, 2024
- "CFPB Brings String of Enforcement Actions to Round Out 2023," January 26, 2024
- "Federal Court Issues Nationwide Injunction of CFPB's Small Business Lending Rule," November 3, 2023
- "NY Federal Court Rules CFPB Vicarious Liability Suit Can Proceed," October 19, 2023
- "CFPB Initiates FCRA Rulemaking on Medical Debt and Data Brokers," October 5, 2023
- "FTC Judge Orders Tax Filing Software Company to Stop Advertising Products as 'Free'," September 21, 2023
- "FTC Settles FCRA Suit Against "People-Search" Companies," September 21, 2023
- "CFPB Sues Installment Lender for Alleged Loan Churning Operation," September 1, 2023
- "FTC Publishes INFORM Act Guidance for Third Party Sellers," August 25, 2023

- "CFPB Sues Auto-Loan Servicer for Allegedly Harming Consumers," August 18, 2023
- "CFPB Forecasts New Rule Cracking Down on Consumer Data Sales," August 18, 2023
- "Nevada EWA Legislation Creates Novel Regulatory Framework," August 4, 2023
- "Latest CFPB Supervisory Highlights Detail UDAAPs Across Range of Areas," August 4, 2023
- "CFPB Sues Lease-to-Own Finance Company for Allegedly Deceiving Consumers," July 20, 2023
- "Texas, Louisiana Enact Digital Asset Licensing Legislation," July 10, 2023
- "FTC Notifies Online Marketplaces of Obligations Under INFORM Act," June 23, 2023
- "CFPB Highlights Risks of Storing Funds in Digital Payment Apps," June 9, 2023
- "Colorado Approves DIDMCA Opt-Out, Raising Concerns for Consumer Credit Access," May 26, 2023
- "CFPB, FTC Continue Crack Down on Debt Relief Schemes," May 19, 2023
- "Lawsuit Challenges CFPB Reporting Rule for Small Business Lending," May 5, 2023
- "CFPB Statement of Interest Highlights Focus on Discriminatory Access to Credit," May 1, 2023
- "Federal Regulators Remain Focused on AI-based Discrimination," May 1, 2023
- "CFPB Director Elevates Priorities for Data Privacy & Repeat Offenders," April 14, 2023
- "CFPB Issues Guidance on "Abusive" Conduct in Financial Markets," April 10, 2023
- "NYDFS Examination of Crypto Payment Service Provider Ends in Settlement," April 10, 2023
- "CFPB, FTC Seek Public Comment on Tenant Background Checks," March 24, 2023
- "CFPB Report Details Financial Profiles of BNPL Borrowers," March 16, 2023
- "Recent CFPB Actions Focus on Protecting Military Families," March 3, 2023
- "Massachusetts AG Settles Enforcement Action Against Auto Lender," March 2, 2023
- "Latest CFPB Rule Proposal Takes Aim at Credit Card Late Fees," February 10, 2023
- "Fed Board Denies Crypto Firm's Bid to Join Federal Reserve System," February 2, 2023
- "Colorado AG Secures Latest Settlement over Unearned GAP Fees," January 26, 2023
- "Iowa AG Usury Investigation into Bank Partnership Ends in Settlement," January 19, 2023
- "CFPB and New York AG File Suit Against "Predatory" Auto Lender," January 12, 2023
- "CFPB and State Regulators Hone in on Interest-Bearing Crypto Accounts," December 15, 2022
- "CFPB Targets Financial Services Company for Deceptive Advertising," December 8, 2022

- "CFPB Issues Latest Crack Down on Junk Fees," November 11, 2022

## Books

Illinois Marijuana Laws and Regulations 2022  
10.24.2022

## Practices

Bankruptcy and Restructuring  
Bankruptcy Litigation  
Distressed Acquisitions Under Bankruptcy Code  
§ 363  
Distressed Real Estate Loan Workouts and Enforcement

## Industries

Healthcare  
Retail, Fashion & Beauty  
Cannabis

## Education

J.D., University of Illinois, 2022, *magna cum laude*  
B.A., University of Illinois at Urbana-Champaign, 2019

## Admissions

Illinois





## → Eduardo Gutierrez Linares

### Associate

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Eduardo Gutierrez Linares is an associate in the Finance and Bankruptcy Practice Group in the firm's San Francisco office.

## Practices

Bankruptcy and Restructuring

## Education

J.D., University of California, Davis, 2023

B.S., University of California, Davis, 2019

## Admissions

California

## Languages

Spanish